PUBLIC VERSION

Via E-mail

January 21, 2002

Gloria Blue
Executive Secretary
Trade Policy Staff Committee
Office of the United States Trade Representative
600 Seventeenth Street, N.W.
Washington, DC 20508

Re: **Revised Public Comments on Potential Action Under Section 203 of the Trade Act of 1974 With Regards to Imports of Certain Steel: *Domestic Producers' Response to Requests to Exclude Products From Import Relief***

Dear Ms. Blue:

Pursuant to the Notice of Request for Comments (66 Fed. Reg. 54321, October 26, 2001, modified 66 Fed. Reg. 59599, November 29, 2001), and in accordance with the request received by email from Andrew Stephens on January 10, 2002, on behalf of the Minimill 201 Coalition (Flat Products); Gallatin Steel Company; Geneva Steel Company; IPSCO Steel Inc.; Nucor Corporation; Rouge Steel Company; Steel Dynamics, Inc.; WCI Steel, Inc.; and Weirton Steel Corporation, we hereby submit to the Office of the United States Trade Representative a revised public version of the Domestic Producers' Response to Requests to Exclude Products From Import Relief. These comments specifically address requests for exclusion of certain carbon and alloy flat products that have thus far been made available by USTR. We reserve the right to

comment on any other exclusion requests that USTR receives. Confidential information has been deleted from brackets at pages 2, 10, 16, 17, 18, 21, 25, 26, 27, 42, 43, 44, 45, 52, 56, and 57. All bracketed information in this submission pertains to specific companies' and their production capabilities, the release of which would cause serious and substantial business harm to the submitters by minimizing or eliminating competitive advantage and furthermore, would impair the ability to obtain such information from domestic producers in the future. Pursuant to 15 C.F.R. § 2003.6, we hereby request that USTR deem bracketed information herein exempt from public inspection. As such, in accordance with 15 C.F.R. § 2004.4 (a)(4), we expect that this submission will also be exempt from public disclosure through a Freedom of Information Act request. Should this not be the case, and such a request is made, we request to be notified and reserve the right to withdraw our submission.

Domestic Producers have withdrawn objection to the exclusion of one product, Textured Rolled Carbon Steel, as requested for exclusion by AvestaPolarit Oy (at document number X-013).

Should you have any questions regarding this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,

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Slab Exclusion Requests

Heavy Slab (X-037.1)

Product Description: Slab in thicknesses greater than 250 mm (about 10 inches).

Exclusion requested by: Brazilian Steel Institute[1]

Response: Domestic Producers object to the exclusion of this product. WCI can produce 10" thick continuous cast slabs.

Thin Slab (X-037.2)

Product Description: Slab in thicknesses less than 190mm (about 7½ inches).

Exclusion requested by: Brazilian Steel Institute[2]

Response: Domestic Producers object to the exclusion of this product. WCI can produce 10" thick continuous cast slabs.

Ultra-Low Carbon Slab (X-037.3)

Product Description: Ultra-low carbon ("ULC") steel is a type of steel produced only using an equipment called Vacuum Degasser with deep vacuum capacity (less than 1 torr of vacuum), which can obtain a carbon content around 0.001% at the end of the process. The three most popular groups of ULC steels are:

- Stabilized Interstitial Free Steel ("IF"). With the improvement in vacuum degassing capacity, ULC with carbon contents below 0.003% has become available. Since then, it has been possible to produce steel where interstitial elements, such as carbon and nitrogen, are completely tied up by a stabilizer such as titanium. This greatly increases the formability of the steel, which is of great value for extra deep drawing (EDD) applications such as for the exposed parts of a motor vehicle. Common ranges of IF steels have carbon contents of

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[1] Exclusion Request from Wilkie Farr & Gallagher on behalf of the Brazilian Steel Institute (November 13, 2001) (Public Document).

[2] Id.

0.005% max or 0.004% max or 0.003%, or even less. Titanium, columbium, or both stabilize them a little over its stechiometric point.

- "Bake-Hardenable" Steel ("BH"). The essence of bake hardening is that the steel is not completely stabilized. The carbon range is a little higher than IF steel and the amount of stabilizers are not enough for a complete stabilization. This characteristic gives it the ability to increase its yield stress significantly during a paint stoving process after forming by a means of a type of strain-aging process. In the delivery condition the steel has the formability of relatively low-strength steel, but in service it has a much higher yield stress. A typical example of its application is car doors. Carbon ranges are usually 0.005% up to 0.015%. A stabilizer such as titanium and/or columbium is used along with small amounts of other elements to increase its strength.

- Motor Lamination Steel. The specification of this group of steels is based on the level of their electrical loss in the strips. The ones caused by Foucault current are proportional to its thickness and the ones caused by hysteresis depend on carbon, other elements like silicon and antimonium and the ferrite grade size. Ultra low carbon steel decreases the electric loss because it has a very low carbon level and permits to obtain a complete ferritic structure. Carbon content can range from 0.005% max up to 0.020% max depending on the resistivity specified. Usually they have additions of silicon and antimonium and are non-grain oriented silicon steel.

Exclusion requested by: Brazilian Steel Institute[3]

Response: **Domestic Producers object to the exclusion of this product. [* * * * * * * * * * * * * * * * * * * *] can produce a motor lamination steel equivalent and we believe several integrated producers can also make this product.**

API Specification Slab (X-037.4)

Product Description: Slab for API-specification pipe and tube.

Exclusion requested by: Brazilian Steel Institute[4]

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[3] Id.

[4] Id.

Response: **Domestic Producers object to the exclusion of this product. WCI can produce continuous cast slabs for API Tube applications. Insufficient detail regarding API grades is set forth and IPSCO believes it can manufacture this product.**

Forging Quality Round Cornered Square Carbon Billets (X-040 & X-121)

Product Description: This product falls under HTSUS classification code 7207.20.00.25 (slabs). It is a semifinished product of iron or nonalloy steel containing by weight 0.25 percent or more of carbon of rectangular (including square) cross section having a width measuring less than four times the thickness. Requestor contends that product is appropriately classified as a billet, and not a slab.

Product is further described by another requester as carbon steel billets of square cross section with carbon 0.25% or greater supplied to the forging industry to be further hot worked to produce forged parts. Billets are of square cross section with rounded corners, typically in various sizes from 2.5" to 8" round cornered squares in lengths ranging from 15' to 30'. Steel is generally produced to specifications including surface quality, cleanliness, and hardenability.

Exclusion requested by: Corus Group[5] and Thyssen Specialty Steels[6]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product. Domestic Producers also believe this product was subject to the negative ITC decision on billets.**

API-Grade Carbon and Steel Alloy Slabs (X-105)

Product Description: API-grade carbon and alloy steel slabs used to manufacture large diameter high-pressure line pipe. The principal characteristics are as follows:

Carbon	0.03% to 0.08% depending on sweet or sour carbon range ± 0.01%
Manganese	1.40% to 1.60% with maximum 0.15% range in total
Vanadium	0.04% to 0.06% with a 0.01% range
Niobium	0.03% to 0.08% with a 0.01% range

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5 Exclusion Request from Steptoe & Johnson on behalf of Corus Group, plc (November 13, 2001) (Public Document).

6 Exclusion request of Thyssen Speciality Steels Inc. (November 13, 2001).

Titanium	Additions
Silicon	Additions
Sulfur	Absolute maximum of 0.0050% with special inclusion shape control

All slab sequences must undergo macro etch testing with at least five tests per slab sequence. The rating on the Mannesmann scale of 0 to 4 must be a 0 or 1. Typical sizes are 72" to 100" wide and 100" to 135" long. All slab cutting must be done in excess of 250° C. Finally, the producing mill must guarantee a maximum of 20° superheat.

Exclusion requested by: Oregon Steel Mills, Inc.[7]

Response: Domestic Producers object to the exclusion of this product. IPSCO can make this product.

Heavy Grade Carbon and Steel Alloy Slabs (X-105)

Product Description: Heavy grade slabs of over ten inches (usually 10 to 16 inches thick) to produce heavy gauge plates of four inches and over. *{nb: Before ITC, stated thickness was 12 to 15 inches}*

Exclusion requested by: Oregon Steel Mills[8]

Response: Domestic Producers object to the exclusion of this product. WCI can produce in 10" thick slabs.

IF Slabs (X-106)

Product Description: Degassed interstitial free carbon and alloy steel slabs. IF slabs are defined as carbon steel slabs with less than 5 ppm of carbon content used for extra deep drawing quality requirement. AK requires IF slabs with a thickness of 9 to 9.5 inches.

Exclusion requested by: AK Steel Corp.[9]

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[7] Exclusion Request from King & Spalding on behalf of Oregon Steel Mills, Inc. (November 13, 2001) (Public Document).

[8] Id.

[9] Exclusion request from King & Spalding on behalf of AK Steel Corp. (November 13, (continued...)

Response: **Domestic Producers object to the exclusion of this product. The domestic industry can produce these slabs. These products should be sourced within the United States.**

Forging Quality Billets (X-121)

Product Description: The product falls under HTS category 7207.20.0025. The product is carbon steel billets of square cross section with carbon 0.25% or greater used for forging applications. These billets are further hot worked to produce forged parts. They are usually supplied to specific customer specifications including surface quality, cleanliness, and hardenability. They can also be supplied to standard AISI grades, such as 1045. The billets are of square cross section, with rounded corners, typically in various sizes from 2.5" to 8" round cornered square (RCS), in lengths ranging from approximately 15' to 30', depending on the size of the forged part being made. U.S. producers are Timken Steel, RTI, and Ispat Inland Bar Division. TSS claims there are no direct substitutes for this product.

Exclusion requested by: Thyssen Specialty Steels, Inc. (TSS)[10]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product. Domestic Producers also believe this product was subject to the negative ITC decision on billets.**

Versa-Bars (X-137)

Product Description: This product falls under HTSUS classification code 7207.20.00.45 (slabs). It is a semifinished product of iron, and are of a square and rectangular cross-section. Versa-Bar is a continuous cast gray and ductile iron with a carbon content ranging from 2.9 percent to 3.7 percent, silicon content of between 1.6 and 2.7 percent, and manganese content of between 0.5 and 0.8 percent. "Versa-Bar bears no resemblance whatsoever to the semi-finished carbon and alloy steel flat products investigated by the International Trade Commission in this investigation."

(...continued)
2001) (Public Document).

[10] Exclusion request from deKieffer & Horgan on behalf of Thyssen Specialty Steels (November 13, 2001) (Public Document).

Exclusion requested by: American Iron & Alloys Corp.[11]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product. Domestic Producers also believe this product was subject to the negative ITC decision on billets.**

All Slabs (X-164)

Product Description: A slab is a semifinished steel prodcut produced by continuou casting or by hot-rolling or forging.

Exclusion requested by: BHP Steel, (AIS) PTY, Ltd., BHP Steel (JLA) PTY, Ltd., BHP New Zealand Steel, Ltd., and BHP Americas (collectively "BHP")[12]

Response: **Domestic Producers object to the exclusion of this product. The domestic industry can produce these slabs. These products should be sourced within the United States.**

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[11] Exclusion request from Hunton & Williams on behalf of American Iron & Alloys Corp. (November 14, 2001) (Public Document).

[12] Exclusion request from Wilmer Cutler & Pickering on behalf of BHP (November 13, 2001) (Public Document).

Plate Exclusion Requests

Abrasion Resistant Plate with Brinell Hardness Ranging from 400 HB to 600 HB (Hardox) (X-006)

Product Description: Abrasion resistant plate with Brinnell hardness ranging from 400 HB to 600 HB. In particular:

- Hardox 400, Quenched and tempered abrasion resistant plate with typical hardness of 400 HB. HARDOX 400 is grain-refined, surface treated with a low zinc silicate primer, formatted with a square edge free of scale, guaranteed to a thickness tolerance of 1/3 ASTM standards, and guaranteed to a flatness tolerance of 4 mm/m or better. Available in a thickness of 1/8" – 5 1/8" and up to 132" wide.

- Hardox 450, Quenched and tempered abrasion resistant plate with typical hardness of 450 HB. HARDOX 450 is grain-refined, surface treated with a low zinc silicate primer, formatted with a square edge free of scale, guaranteed to a thickness tolerance of 1/3 ASTM standards, and guaranteed to a flatness tolerance of 4 mm/m or better. Available in a thickness of 1/8" – 5 1/8" and up to 132" wide.

- Hardox 500, Quenched and tempered abrasion resistant plate with typical hardness of 500 HB. HARDOX 500 is grain-refined, surface treated with a low zinc silicate primer, formatted with a square edge free of scale, guaranteed to a thickness tolerance of 1/3 ASTM standards, and guaranteed to a flatness tolerance of 4 mm/m or better. Available in a thickness of 1/8" – 3 1/8" and up to 132" wide.

- Hardox 600, Quenched and tempered abrasion resistant plate with typical hardness of 600 HB. HARDOX 600 is grain-refined, surface treated with a low zinc silicate primer, formatted with a square edge free of scale, guaranteed to a thickness tolerance of 1/3 ASTM standards, and guaranteed to a flatness tolerance of 4 mm/m or better. Available in a thickness of 1/8" – 2" and up to 132" wide.

Exclusion requested by: AJ Weller Corp. (Descriptions taken from SSAB Exclusion request)[13]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

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[13] Letter from Thomas J. Edwards, President, A.J. Weller Corp. to Mr. James R. Simoes, Hunton & Williams (November 7, 2001) (Public Document).

Thin Nickel Alloy Clad Plates (X-021.1)

Product Description: This product is used for Power Plant Chimneys and Absorbers. This product falls under the HTSUS 7210.90.10.00 and 7212.60.00.00. This specific product has a very specific application in coal-fired electric power generation plants. Grobblech does not specify what sizes and thickness they are asking to be excluded.

Exclusion requested by: Voestalpine Grobblech GmbH[14]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

ALFORM 700 (X-021.2)

Product Description: 100,000psi. Themomechanically rolled high strength low alloy discrete/heavy plates. HTSUS No. 7225.40.30.50 Hot Rolled or other alloy, not in coils, with a thickness of 4.75 mm or more.

Exclusion requested by: Voestalpine Grobblech GmbH[15]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

ALFORM 900 (X-021.3)

Product Description: 130,000psi. Themomechanically rolled high strength low alloy discrete/heavy plates. HTSUS No. 7225.40.30.50 Hot Rolled or other alloy, not in coils, with a thickness of 4.75 mm or more.

Exclusion requested by: Voestalpine Grobblech GmbH[16]

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[14] Exclusion request from deKieffer & Horgan on behalf of Voestalpine Grobblech GmbH (November 13, 2001) (Public Document).

[15] Id.

[16] Id.

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

ALFORM 960 (X-021.4)

Product Description: 140,000psi. Themomechanically rolled high strength low alloy discrete/heavy plates. HTSUS No. 7225.40.30.50 Hot Rolled or other alloy, not in coils, with a thickness of 4.75 mm or more.

Exclusion requested by: Voestalpine Grobblech GmbH[17]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

ALTRIX - Three Layer Clad Plates (X-021.5)

Product Description: Wear resistant 3-layer plates imported under HTS Nos. 7212.50.0000 (Clad of a width of 600 mm or more) and 7212.60.0000 (Clad of a width of less than 600 mm). (Product brochure is supplied.)

Exclusion requested by: Voestalpine Grobblech GmbH[18]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Other Clad Plates (X-021.6)

Product Description: Clad flat-rolled products of iron or nonalloy steel. HTSUS No. 7210.90.10.00 (Clad of a width of 600 mm or more), 7212.60.00.00 (Clad of a width of less than 600 mm). Product brochure is attached.

Exclusion requested by: Voestalpine Grobblech GmbH[19]

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17 Id.

18 Id.

19 Id.

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Thermomechanically Rolled Structural Plate (X-022)

Product Description: This product falls under the HTSUS category 7225.40.3050. They are structural plates of other alloy steel produced by thermomechanically rolling that (1) are prequalified for improved weldability under an internationally recognized standard such as API RP2Z, (2) have a minimum yield strength of 60 ksi and meet increased requirements for fracture toughness and ductility, or (3) have a minimum yield strength of 70 ksi.

Exclusion requested by: AG der Dillinger Hüttenwerke[20]

Response: **Domestic Producers object to the exclusion of this product. [* * * * * * * * * * * * * * * * * * * *] has the capabilities to produce coil for conversion to plate at these strengths.**

360 BHN (nominal) Plate (X-032.1)

Product Description: Hot-rolled alloy steel plate quenched to a 360 nominal BHN hardness. It is not further processed, tempered, flattened, or desulpherized. It is used for low grade maintenance applications, such as lining truck boxes.

Exclusion requested by: Lyman Steel Company[21]

Response: **Domestic Producers object to the exclusion of this product. WCI can produce strip mill plate product. Additional information on chemistry and dimensions is needed.**

13% Austenitic Manganese Steel Plate (X-032.2)

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[20] Exclusion request from deKieffer & Horgan on behalf of AG der Dillinger Hüttenwerke (November 13, 2001) (Public Document).

[21] Exclusion request from Coudert Brothers on behalf of the Lyman Steel Company (November 13, 2001) (Public Document).

Product Description: This product has the following chemistry: C (.80-.90), Si (.10-.45), Mn (12.00 – 14.00), P (.035 max.), S (.040 max.), Cr (.50 max.), Mo (.150 max.), Ni (.40 max.). The manganese content is intentionally made high in order to obtain an austentic microstructure.

Exclusion requested by: Lyman Steel Company[22]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Creusabro 8000® (X-083.1)

Product Description: Creusabro 8000® carbon/alloy cut-to-length plate is cut-to-length plate between 4 and 63 millimeters thick, possessing a carbon content of 0.23 to 0.27 percent by weight, a manganese content of 1.00 to 1.50 percent by weight, a chromium content of 0.6 to 1.2 percent by weight, a sulfur content of 0.002 percent by weight, and a phosphorous content of 0.015 percent by weight. Additionally, this product provides tensile strength of 1400 to 1700 mpa, guaranteed impact properties of 40J/cm^2 at –20 degrees Celsius, and a guaranteed hardness of 430 to 500 bhn.

Exclusion requested by: Usinor, Arbed, and Aceralia[23]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Creusabro M™ (X-083.2)

Product Description: Creusabro M™ carbon/alloy cut-to-length plate is a non-magnetic, fully austenitic structure offering guaranteed hardness of 180-245 bhn and a tensile strength of 800 mpa. Carbon content of 1.1 to 1.2% by weight, a manganese content of 12.0 to 13.5% by weight, and a maximum sulfer content of 0.010% by weight, phosphorous of 0.030% and a maximum silicon content of 0.010% by weight. USINOR states that it is the sole supplier of Creusabro M™ carbon/alloy cut-to-length plate in thicknesses between 4 and 120 millimeters. Additionally, USINOR states that it is the sole supplier for 96-inch wide Creusabro M™ carbon/alloy cut-to-length plate with thicknesses ranging from 4.75 to 6.35 millimeters.

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22 Id.

23 Exclusion request from Shearman & Sterling on behalf of Usinor, Arbed, & Aceralia (November 13, 2001) (Public Document).

Exclusion requested by: Usinor, Arbed, and Aceralia[24]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Astralloy V®™ (X-083.3)

Product Description: Astralloy V®™ carbon/alloy cut-to-length plate in thicknesses ranging between 3 and 6 millimeters that provides increased wear resistance. Its chemical composition is 0.24 carbon, 0.925 manganese, 3.5 nickel, 1.5 chromium, 0.3 molybendum.

Exclusion requested by: Usinor, Arbed, and Aceralia[25]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Nine Percent Nickel Alloy Steel Plate (X-083.4)

Product Description: Heavy steel plate of thickness 0.1875 inches and greater, quenched and tempered with extremely high strength characteristics, namely high-impact values at -196 degrees Celsius, used in the construction of tanks for the storage of cryogenic products. Usinor claims this product is not produced domestically in widths greater than 136" and thickness less than 0.339 inches when the plate is greater than 96 inches in width.

Exclusion requested by: Usinor, Arbed, and Aceralia[26]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Clad Plate (X-083.5)

Product Description: All clad plate.

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[24] Id.

[25] Id.

[26] Id.

Exclusion requested by: Usinor, Arbed, and Aceralia[27]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Marshalloy MQ (X-083.6)

Product Description: Marshalloy Mold Quality 4142 plate in thickness range 6 mm to 229 mm. This product possesses the following chemical composition (as percentage by weight):

C (0.36-0.42), Mn (1.10-1.30), Si (0.35-0.45), S (0.012-0.20), P (0.030 max), Ni (0.25 - 0.50), Cr (1.00-1.20), Mo (0.15-0.35), Cu (0.30 max), O2 (20 ppm), H2 (2 ppm).

Exclusion requested by: Usinor, Arbed and Aceralia[28]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Superplast SP 300 (X-083.7)

Product Description: Plastic mold steel plates, pre-forged and rolled blocks and forged extra-heavy section blocks with thickness greater than 150 mm. This product possesses the following chemical composition (as percentage by weight):

C (0.25), Cr (1.3), Mn (1.3), Ni (<0.3), Mo (0.4), Si (<0.15)

Exclusion requested by: Usinor, Arbed and Aceralia[29]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

ARMOX Tempered Plate (X-088.1)

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27 Id.

28 Id.

29 Id.

Product Description: ARMOX products are quenched and tempered armor plates with Brinell hardness rating ranging from 360 HB to 600 HB. It is grain refined, surface treated with a low zinc silicate, formatted to a square edge, free of scale, and available in 1/8" to 5" thickness and width to 132".

Exclusion requested by: SSAB Oxelosund AB[30]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

HARDOX Abrasion Resistant Flat-Rolled (X-088.2)

Product Description: The product falls under HTS categories 7225.40.3050 and 7225.40.7000. Abrasion resistant flat rolled products of other alloy steel, not in coils, with a minimum Brinell Hardness of 400 to 600 HB.
For example:

- Hardox 400, Quenched and tempered abrasion resistant plate with typical hardness of 400 HB. HARDOX 400 is grain-refined, surface treated with a low zinc silicate primer, formatted with a square edge free of scale, guaranteed to a thickness tolerance of 1/3 ASTM standards, and guaranteed to a flatness tolerance of 4 mm/m or better. Available in a thickness of 1/8" – 5 1/8" and up to 132" wide.

- Hardox 450, Quenched and tempered abrasion resistant plate with typical hardness of 450 HB. HARDOX 450 is grain-refined, surface treated with a low zinc silicate primer, formatted with a square edge free of scale, guaranteed to a thickness tolerance of 1/3 ASTM standards, and guaranteed to a flatness tolerance of 4 mm/m or better. Available in a thickness of 1/8" – 5 1/8" and up to 132" wide.

- Hardox 500, Quenched and tempered abrasion resistant plate with typical hardness of 500 HB. HARDOX 500 is grain-refined, surface treated with a low zinc silicate primer, formatted with a square edge free of scale, guaranteed to a thickness tolerance of 1/3 ASTM standards, and guaranteed to a flatness tolerance of 4 mm/m or better. Available in a thickness of 1/8" – 3 1/8" and up to 132" wide.

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30 Exclusion request from Hunton & Williams on behalf of SSAB Oxelosund AB (November 13, 2001) (Public Document).

- Hardox 600, Quenched and tempered abrasion resistant plate with typical hardness of 600 HB. HARDOX 600 is grain-refined, surface treated with a low zinc silicate primer, formatted with a square edge free of scale, guaranteed to a thickness tolerance of 1/3 ASTM standards, and guaranteed to a flatness tolerance of 4 mm/m or better. Available in a thickness of 1/8" – 2" and up to 132" wide.

Exclusion requested by: SSAB Oxelosund AB[31]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

WELDOX Structural Plate With Yield Strengths From 100 ksi to 160 ksi (X-088.3)

Product Description: High-strength structural steel plate with yield strengths ranging from 100 ksi to 160 ksi. In particular:

- Weldox 100 Extra High Strength Plate. This exclusion request falls under the HTS category 7225.40.3050. It is a quenched and tempered structural steel plate with a minimum yield strength of 100 ksi. Surface treated with a low zinc silicate primer, formatted with a square edge, free of scale, guaranteed to thickness tolerance of 1/3 ASTM standards and guaranteed to flatness tolerance of 4 mm/m or better. Available in thickness of 1/8"- 5" amd width to 132".

- Weldox 130 Extra High Strength Plate. This exclusion request covers HTS numbers 7225.40.3050 and 7225.40.7000. It is a quenched and tempered structural steel plate with a minimum yield strength of 130 ksi. Surface treated with a low zinc silicate primer, formatted with a square edge, free of scale, guaranteed to thickness tolerance of 1/3 ASTM standards and guaranteed to flatness tolerance of 4 mm/m or better. Available in thickness of 1/8"- 5" amd width to 132".

- Weldox 140 Extra High Strength Plate. This exclusion request covers HTS numbers 7225.40.3050 and 7225.40.7000. It is a quenched and tempered structural plate with a minimum yield strength of 140 ksi. Surface treated with a low zinc silicate primer, formatted with a square edge, free of scale, guaranteed to thickness tolerance of 1/3 ASTM standards and guaranteed to flatness tolerance of 4 mm/m or better. Available in thickness of 1/8"- 3" amd width to 132".

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[31] Id.

- Weldox 160 Extra High Strength Plate. This exclusion request covers HTS numbers 7225.40.3050 and 7225.40.7000. It is a quenched and tempered structural plate with a minimum yield strength of 160 ksi. Surface treated with a low zinc silicate primer, formatted with a square edge, free of scale, guaranteed to thickness tolerance of 1/3 ASTM standards and guaranteed to flatness tolerance of 4 mm/m or better. Available in thickness of 1/8"- 2" amd width to 132".

Exclusion requested by: SSAB Oxelösund AB and SSAB Tunnplat AB[32]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Extra-Wide Plate (X-098)

Product Description: Flat-rolled products of iron, nonalloy or other alloy steel, not in coils, with a thickness of 10 mm or more and a width of more than 3,900 mm. Imported under HTS Nos. 7208.40.3030, 7208.51.00, 7208.90.0000, 7225.40.3005, 7225.40.3050, & 7225.50.6000.

Exclusion requested by: AG der Dillinger Hüttenwerke[33]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

X-70 and Higher Line Pipe Plate (X-100)

Product Description: Flat-rolled products of iron or nonalloy steel, of a width of 600 mm or more, a thickness exceeding 10 mm, meeting the API standards for X-70 and higher line pipe plate.

Exclusion requested by: Grobblech GmbH, AG der Dillinger Hüttenwerke, etc.[34]

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[32] Exclusion request from Hunton & Williams on behalf of SSAB Oxelosund AB (November 13, 2001) (Public Document).

[33] Exclusion request from deKieffer & Horgan on behalf of AG der Dillinger Hüttenwerke (November 13, 2001) (Public Document).

[34] Exclusion request from deKieffer & Horgan on behalf of Various Producers (November

(continued...)

Response: **Domestic Producers object to the exclusion of this product. WCI can produce this product, however, more information on sizes and impact requirements is needed. IPSCO can produce up to 2-inch thickness material and up to 120-inch thickness. As explained in IPSCO's testimony before the ITC, IPSCO would be quite prepared to work with the companies to further develop the product. [* *] and Steel Dynamics, Inc. also object to exclusion of this product.**

<u>Abrasion Resistant Plate (X-142.1)</u>

Product Description: Abrasion resistant plate with a Brinell hardness of 360 or more.

Exclusion requested by: Japanese Respondents[35]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

<u>Certain High Alloy Plate (Grade 517E Alloy Plate) (X-142.2)</u>

Product Description: High tensile alloy plate with tensile strength of 90 ksi or greater (grade 517E alloy plate).

Exclusion requested by: Japanese Respondents[36]

Response: **Domestic Producers object to the exclusion of this product. [* *] and [* *] can produce this product. Grade 100 products currently under development by IPSCO may satisfy this exclusion request but insufficient detail is set forth.**

(...continued)
13, 2001) (Public Document).

35 Exclusion request from Willkie Farr & Gallagher on behalf of Japanese Respondents (November 13, 2001) (Public Document).

36 <u>Id.</u>

Certain High-Carbon, Hot-Rolled Alloy Steel (X-142.3)

Product Description: High-carbon hot-rolled alloy steel plate made to specifications SAE 8670 modified, SAE 4135 (modified), SAE 8660, JIS SCM 435, SCM 415.

Exclusion requested by: Japanese Respondents[37]

Response: **Domestic Producers object to the exclusion of this product. [* * * * * * * * * * * * * * * * * * *], Rouge, and WCI can make this product. Additionally, grades 4130 and 4135 are under development at IPSCO's U.S. steel mills with 8660 and 8670 also under development but at an earlier stage.**

Alloy Ripper Shank Steel (X-115)

Product Description: Alloy ripper shank steel is cut from rectangular hot-rolled alloy special sections, with a cross section of 2.9 inches to 4.3 inches by 13 inches to 17.7 inches. The ripper shank steel has rounded edges. The aluminum fine-grain steel of the alloy ripper shank steel is vacuum degassed, and produced to Caterpillar's proprietary specifications, which govern cleanliness, chemistry and hardenability. For customs purposes, alloy ripper shank steel can be described as follows: other flat-rolled products, vacuum degassed, with rounded edges, with a width of 300 mm or more but not exceeding 500 mm and with a thickness less than 125 mm, with a reduction ratio of 5:1 or greater, suitable for use in the manufacture of ripper shanks for vehicles of heading 8429. Imported under HTS number 7226.91.5000. No U.S. mill produces this product with Caterpillar's high reduction ratio requirement.

Exclusion requested by: Caterpillar Inc.[38]

Response: **Domestic Producers object to the exclusion of this product. WCI may be able to produce, but additional specifications on chemistry and edging requirements are needed.**

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37 Id.

38 Exclusion request from Powell Goldstein on behalf of Caterpillar Inc. (November 13, 2001) (Public Document).

NAK 55 (X-134.1)

Product Description: Product is a plastic mold steel, that is distinguishable from standard-grade plastic mold steels like AISI P20. Chemistry of product is business proprietary information, physical properties: HRc 40; Tensile Strength 182,000 psi; Reduction 39.8%; magnetic properties: maximum magnetic permeability = 380, saturated magnetism (Gauss) = 16,350, residual magnetism (Gauss) 8,500. NAK 55 is double melted, first in an electric furnace then a vacuum arc re-melt furnace, it is hot-rolled or forged to shape, and age hardened to HRc 40.

Exclusion requested by: International Mold Steel[39]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

NAK 80 (X-134.2)

Product Description: Product is a plastic mold steel used for very demanding niche applications, such as clear lens molds and extremely critical diamond finish applications. Chemistry of product is business proprietary information, physical properties: HRc 40; Tensile Strength 183,400 psi; Reduction 41.9%; magnetic properties: maximum magnetic permeability = 380, saturated magnetism (Gauss) = 16,360, residual magnetism (Gauss) 8,500, and Coercive Force (Oersted) = 14.0. NAK 80 is double melted, first in an electric furnace then a vacuum arc re-melt furnace, it is hot-rolled or forged to shape, and age hardened to HRc 40.
Exclusion requested by: International Mold Steel[40]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

PX5 (X-134.3)

Product Description: Product is used in all types of plastic molding and design, and is superior to AISI grade P20-type steels in terms of machining, stability, and welding. Chemistry of product is business proprietary information, physical properties: HRc 30-33; Tensile Strength 150,000 psi; Reduction 48.%, Yield = 133,000 psi. PX5 is produced by electric furnace melting, ladle

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[39] Exclusion request from Arent Fox Kitner on behalf of International Mold Steel (November 13, 2001) (Public Document).

[40] Id.

degassed and refined. Proprietary forging, rolling and heat-treating practices are utilized to produce an exceptionally fine-grained, stable, tough and easy to machine and weld mold steel.

Exclusion requested by: International Mold Steel[41]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

CX1 (X-134.4)

Product Description: Product is a proprietary cold work die steel that is the first to be supplied pre-heat treated to hardness of HRc 50, and can also be machined at this hardness. No die steel, including lower-grade D2 products manufactured domestically, can be machined at this very high level of hardness. Chemistry of product is business proprietary information, physical properties: HRc 50; Tensile Strength 259,000 psi; Yield Strength 238,000 psi, elongation 8 percent, Reduction in area = 19 percent. CX1 is produced by electric furnace melting, ladle degassing and refining. Proprietary forging, rolling and heat-treating practices are utilized to produce and exceptionally fine-grained, stable, tough and easy to machine and weld die steel.

Exclusion requested by: International Mold Steel[42]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Super NAK ("NAK HH") (X-134.5)

Product Description: Product is a plastic mold steel that provides a unique combination of high hardness and ability to machine-work the steel. Chemistry of product is business proprietary information, physical properties: HRc 45; Tensile Strength 1385 longitudinal, 1359 transverse; Yield Strength 1031 longitudinal, 1009 transverse, elongation 11 percent longitudinal, 4 percent transverse, Reduction in area 22 percent longitudinal, 6 percent transverse. Density = 7.78 Mg/m^3. Super Nak is produced in an electric furnace then vacuum arc re-melt furnace. Hot-rolled or forged to shape. Age hardened to HRc 45-48.

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41 Id.

42 Id.

Exclusion requested by: International Mold Steel[43]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Floor plate (X-179)

Product Description: Floor plate is made in accordance with the ASTM specifications that are set forth in ASTM Designation A 786. IN cases where chemistry is sprecified, the floor plate is produced either to ASTM A 36 (structural carbon steel) or ASTM A 572 Grade 50 (high strength low alloy).

Exclusion requested by: Dufeco Clabecq, S.A. and Duferco Steel, Inc. (collectively "Duferco")[44]

Response: **Domestic Producers object to the exclusion of this product. [* * * * * * * * * * * * * * * * * * * *] makes this product in widths up to 64 inches; Geneva has manufactured floor plate in widths of 64 inches and wider.**

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[43] Id.

[44] Exclusion request from White & Case on behalf of Duferco (November 13, 2001) (Public Document).

Hot-Rolled Exclusion Requests

Hot rolled dual-phase carbon steel sheet (X-011)

Product Description: Hot-rolled dual-phase steel, phase-hardened, primarily with a ferritic - martensitic microstructure, containing 0.9 percent up to and including 1.5 percent silicon by weight, further characterized by either (i) tensile strength between 540 N/mm^2 and 640 N/mm^2 and an elongation percentage ≥ 26 percent for thicknesses of 2 mm and above; or (ii) a tensile strength between 590 N/mm^2 and 690 N/mm^2 and an elongation percentage ≥ 23 percent for thicknesses of 2 mm and above.

Exclusion requested by: Honda of America Mfg., Inc.[45]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Hot rolled sheet for coiled tubing used in high pressure oil and gas wells (X-025)

Product Description: Six types of hot-rolled sheet for use in high pressure oil and gas wells with the following specifications:

(1): C (0.10-0.14%), Mn (0.90% Max), P (0.025% Max), S (0.005% Max), Si (0.30-0.50%), Cr (0.50-0.70%), Cu (0.20-0.40%), Ni (0.20% Max); Width = 44.80 inches maximum; Thickness = 0.063-0.198 inches; Yield Strength = 50,000 psi minimum; Tensile Strength = 70,000-88,000 psi;

(2): C (0.10-0.16%), Mn (0.70-0.90%), P (0.025% Max), S (0.006% Max), Si (0.30-0.50%), Cr (0.50-0.70%), Cu (0.25% Max), Ni (0.20% Max), Mo (0.21% Max);Width = 44.80 inches maximum; Thickness = 0.350 inches maximum; Yield Strength = 80,000 psi minimum; Tensile Strength = 105,000 psi Aim;

(3): C (0.10-0.14%), Mn (1.30-1.80%), P (0.025% Max), S (0.005% Max), Si (0.30-0.50%), Cr (0.50-0.70%), Cu (0.20- 0.40%), Ni (0.20% Max),V (wt.)(0.10 Max), Cb (0.08% Max);Width = 44.80 inches maximum; Thickness = 0.350 inches maximum; Yield Strength = 80,000 psi minimum; Tensile Strength = 105,000 psi Aim;

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[45] Exclusion request from Honda of America Mfg., Inc. (Nov. 7, 2001) (Public Version).

(4): C (0.15% Max), Mn (1.40% Max), P (0.025% Max), S (0.010% Max), Si (0.50%), Cr (1.00% Max), Cu (0.50% Max), Ni (0.20% Max), Nb (0.005% Min), Ca (Treated), Al (0.01-0.07%); Width = 39.37 inches; Thickness = 0.181 inches maximum; Yield Strength = 70,000 psi minimum for thickness ≤ 0.148 inches and 65,000 psi minimum for thickness >0.148 inches; Tensile Strength = 80,000 psi minimum.

(5): C (0.10-0.15%), Mn (1.30-1.80%), P (0.025% Max), S (0.007% Max), Si (0.30-0.50%), Cr (0.30-0.70% Max), Cu (0.20- 0.40 Max), Ni (0.20% Max), Mo (0.40% Max), Nb (0.08% Max), V (0.10% Max);Width = 44.80 inches maximum; Thickness = 0.350 inches maximum; Yield Strength = 70,000 psi minimum (95,000-105,000 psi AIM)

(6): C (0.10-0.16%), Mn (0.70-0.90%), P (0.020% Max), S (0.005% Max), Si (0.30-0.50%), Cr (0.50-0.70%), Cu (0.25% Max), Ni (0.20% Max), Mo (0.21% Max);Width = 44.80 inches maximum; Thickness = 0.350 inches maximum; Yield Strength = 51,500 psi minimum, 82,500 psi maximum; Tensile Strength = 70,000 psi minimum.

Exclusion requested by: Sumitomo Metal Industries, Ltd. and Quality Tubing, Inc.[46]

Response: Domestic Producers object to the exclusion of this product. WCI can produce all six products referenced. IPSCO is in the process of developing products that could meet these specifications.

Battery-quality hot band steel (X-030 & X-038)

Product Description: Hot-rolled, continuously cast steel sheet in coil. The steel shall be ultra-clean, with individual particles of non-metallic inclusions not greater than 1 micron (.000039 inches) and clusters or groups of non-metallics not exceeding 5 microns (.000197 inches) in length. The chemical composition shall be (%):

C	.08 max	aim	.05 max
Mn	.45 max	aim	.30 max
P	.025 max	aim	.015 max
S	.020 max	aim	.015 max
Al	.025/.065	aim	.030/.050 (.025 min acid soluble)
Si	.050 max		

[46] Exclusion request from Wilmer Cutler & Pickering on behalf of Sumitomo Metal Industries, Ltd. and Quality Tubing, Inc. (November 13, 2001) (Public Version).

Cr .050 max
Ni .050 max
Cu .050 max
Mo .010 max

except when a nominal thickness of .081 inches is ordered, in which case the maximum carbon content shall be 0.064%.

Scale shall be completely removable by hydrochloric acid pickling, the resulting surfaces being free of digs, scratches, pits, gouges and slivers. The steel shall have a typical crown of less than .002 inches, measured 0.75 inch from the edge of the coil.

Exclusion requested by: The Gillette Company[47] and Thomas Steel Strip Corporation[48]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

13% austenitic manganese steel sheet (X-032)

Product Description: C: .80 - .90; Si: .10 - .45; Mn: 12.00 - 14.00; P: .035 max; S: .040 max; Cr: .50 max; Mo: .150 max; Ni: .40 max.

Exclusion requested by: Lyman Steel Company[49]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

ASTM A1011/A-00 DS Type A (X-034.1)

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47 Exclusion request from Covington & Burling on behalf of The Gillette Company (Nov. 13, 2001) (Public Document).

48 Exclusion request from Steptoe & Johnson LLP on behalf of Thomas Steel Strip Corporation (Nov. 13, 2001) (Public Version).

49 Exclusion request from Coudert Brothers LLP on behalf of Lyman Steel Company (Nov. 13, 2001) (Public Document).

Product Description: 14Ga. (.074+/-.003) x 31.0+/-.062 x Coil HRPODQAK ASTM A 1011/A-00 DS Type A Temper Passed.

Exclusion requested by: ATACO Steel Products Corporation[50]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* * * * * * * * * * * * * * * * * * * *] are able to make this product.**

ASTM A622C1 Boron Grade (X-034.2)

Product Description: 10 GA 39.50+.18-.00 X HRPODQAK ASTM A622C1 BORON GRADE.

Exclusion requested by: ATACO Steel Products Corporation[51]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* * * * * * * * * * * * * * * * * * * *] are able to make this product.**

ASTM A569 1008/1010 (X-034.3)

Product Description: 1875 17.25+.010 X COIL HRPODQAK ASTM A569 1008/1010

Exclusion requested by: ATACO Steel Products Corporation[52]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* * * * * * * * * * * * * * * * * * * *] are able to make this product.**

ASTM A622C1 Coil (X-034.4)

Product Description: 13GA 32.50+.12-.00 HRPODQAK ASTM A622C1 COIL

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50 Exclusion request of ATACO Steel Products Corp. (Nov. 12, 2001) (Public Document).

51 Id.

52 Id.

Exclusion requested by: ATACO Steel Products Corporation[53]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* * * * * * * * * * * * * * * * * * * *] are able to make this product.**

ASTM A622C1 .097-.107 (X-034.5)

Product Description: 12GA X 38.25+.125-.00 COIL HRDQSKPO ASTM A622C1 .097-.107

Exclusion requested by: ATACO Steel Products Corporation[54]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* * * * * * * * * * * * * * * * * * * *] are able to make this product.**

ASTM A622C1 Boron Grade (X-034.6)

Product Description: 10GA 36.00+.1875-.00X HRPODQAK COIL ASTM A622C1 BORON GRADE

Exclusion requested by: ATACO Steel Products Corporation[55]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* * * * * * * * * * * * * * * * * * * *] are able to make this product.**

ASTM A622C1 COIL .097-.107 (X-034.7)

Product Description: 12GA 20.50+/-.020 X HRPODQAK ASTM A622C1 COIL .097-.107

Exclusion requested by: ATACO Steel Products Corporation[56]

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53 Id.

54 Id.

55 Id.

56 Id.

Response: **Domestic Producers object to the exclusion of this product. WCI and [* *] are able to make this product.**

ASTM A 622C1 .097-.107 (X-034.8)

Product Description: 12GA X 30.00+/-.030 COIL HRDQSKPO ASTM A622C1 .097-.107

Exclusion requested by: ATACO Steel Products Corporation[57]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* *] are able to make this product.**

Domex hot-rolled extra high strength steels (X-046 & X-108)

Product Description: DOMEX 100, DOMEX 110, DOMEX Wear, DOMEX Weather Resistant, DOMEX Defend 250, DOMEX Defend 300, and DOMEX Defend 500. The HTS numbers under which these products enter the United States are: 7225.30.3050, 7225.30.7000, 7208.36.0030, 7208.37.0030, 7208.38.0015 and 7208.39.0015.

[57] Id.

Mechanical properties and dimension ranges:

	Domex 100	**Domex 110**	**Domex Wear (Typical)**	**Domex Weather Resistant**
Yield Strength (minimum ksi)	100,000	110,000	(115,000)	80,000 & 100,000
Tensile Strength (minimum ksi)	110,000	118,000	(135,000)	85,000 & 105,000
Elongation %	15	15	15	18
Bendability	1.6 –1.8xt	1.6-1.8xt	2xt	1xt
Thickness Range	.079”-.437”	.079”-.437”	.118”-.250”	.093”-.250”
Width Range	35”-63”	35”-63”	35”-63”	35”-50”
Impact Toughness	20ft.lbs at –40F°	20ft.lbs at –40F°	20ft.lbs at –40F°	20ft.lbs at –40F°

	Domex Defend 250	Domex Defend 300	Domex Defend 500
Hardness	250 Hv	300 Hv	500 Hv
Thickness Range	0.118"-0.236"	0.118"-0.236"	0.079"-0.236"
Width Range	35"-49"	35"-49"	35"-49"

Chemical Composition Typical Values:

Domex Defend	C	Si	Mn	P	S	Al	Micro Alloying Elements
250	0.12	0.40	2.00	0.025	0.01	0.015	Nb, V, Ti, Mo
300	0.17	0.30	1.80	0.025	0.01	0.04	Cr, Mo, Ti
500	0.29	0.30	1.30	0.035	0.025	–	Cr, Ni, Mo, B

Chemical Composition:

	C max.	Si max.	Mn max.	P max.	S max.	Al min.	Cb max.	Ti max.
Domex 100	0.12	0.60	2.0	0.025	0.010	0.015	0.09	0.20
Domex 110	0.12	0.60	2.1	0.025	0.010	0.015	0.09	0.20

TV= Typical Values	C TV	Si TV	Mn TV	P TV	S max.	Cr TV	Mo TV	Al TV	Ti TV
Domex Wear	0.17	0.30	1.8	0.01	0.01	0.3	0.1	0.04	0.16

	C max.	Si max.	Mn max.	P max.	Cu max.	Cr max.	Micro Alloying Elements
Domex Weather Resistant	0.10	0.45	0.80	0.12	0.35	0.95	Added

Exclusion requested by: Cargill Ferrous International[58] and SSAB Tunnplat AB[59]

Response: **Domestic Producers object to the exclusion of this product. WCI can can produce 100XF hot-rolled sheet similar to Domex 100. IPSCO can make weather resistant products that would be comparable – IPSCO does not make Gr. 100 or 110 or wear products in the U.S. currently, but is developing these products.**

Thin Gauge Hot Rolled Coil (X-055)

Product Description: Thin gauge hot rolled coil (TGHR) can be defined as hot rolled coil in gauges 2.0mm and thinner (e.g. normal cut-off in the USA is on .087" or 2.2mm).

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[58] Exclusion request from Cargill Ferrous International (November 12, 2001) (Public Document).

[59] Exclusion request from Hunton & Williams on behalf of SSAB Tunnplat AB (November 13, 2001) (Public Version).

Exclusion requested by: South African Iron and Steel Institute[60]

Response: **Domestic Producers object to the exclusion of this product. The domestic industry can supply these products. Thin gauge hot-rolled is commercially available from many domestic producers. WCI can produce within size capabilities and Gallatin Steel would welcome the opportunity to supply material as thin as 1.4 mm. There is no basis for this request.**

Hot-rolled dual phase steel (X-061.1)

Product description: Hot-rolled dual phase steel, phase-hardened, primarily with a ferretic-martensitic microstructure, contains 0.9 percent up to and including 1.5 percent silicon by weight, further characterized by either (i) tensile strength between 540 N/mm^2 and 640 N/mm^2 and an elongation percentage $\geq$ 26 percent for the thicknesses of 2mm and above; or (ii) a tensile strength between 590 N/mm^2 and 690 N/mm^2 and an elongation percentage $\geq$ 25 percent for thicknesses of 2mm and above.

Exclusion requested by: Nippon Steel Corporation[61]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Hot-rolled high flange-formability steel (X-061.8)

Product description: Three varieties of hot-rolled high flange-formability steel:

Variety 1:
Chemical composition:
carbon content up to .25% by weight; silicon content up to 1% by weight, manganese content up to 2% by weight, phosphorus content up to .05% by weight, sulfur content up to .020% by weight, titanium content up to .10% by weight.
Physical & mechanical properties:
thickness range of 1.4 to 6.0mm (inclusive); minimum tensile strength (MPA) of 440 (N/mm^2);

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60 Exclusion request from O'Melveny & Myers LLP on behalf of South African Iron and Steel Institute (November 13, 2001)(Public Version).

61 Exclusion request from Gibson Dunn & Crutcher LLP on behalf of Nippon Steel Corporation (November 13, 2001) (Public Version).

If 1.2mm to 1.59mm thickness range; yield point (MPA): 295≤410 (N/mm^2); elongation: 28≤41(%)
If 1.6mm to 1.99mm thickness range; yield point (MPA): 285≤400 (N/mm^2); elongation: 29≤42(%)
If 2.0mm to 2.49mm thickness range; yield point (MPA): 275≤390(N/mm^2); elongation: 30≤43(%)
If 2.5mm to 3.19mm thickness range; yield point (MPA): 275≤390 (N/mm^2); elongation: 32≤45(%)
If 3.2 mm to 3.99mm thickness range; yield point (MPA): 265≤380 (N/mm^2); elongation: 33≤46(%)
If 4.0mm to 6.0mm thickness range; yield point (MPA): 265≤380 (N/mm^2); elongation: 34≤47(%)

Burring Test: 100% Min.

Response: **Domestic Producers object to the exclusion of this product. Material is available domestically and Chemistry and physical properties are commercially available. WCI can produce, but needs dimensions for inquiry.**

Variety 2:

Chemical composition: carbon content up to 0.25%, by weight; silicon content up to 1.00%, by weight; manganese content up to 2.00%, by weight; Phosphorus content up to 0.050%, by weight; sulfur content up to 0.020%, by weight; titanium content up to 0.10%, by weight;
physical & mechanical properties:
thickness range of 1.600 to 6.000 mm (inclusive); minimum tensile strength (MPA) of 540(N/mm^2);
if 1.6 mm to 1.99 mm thickness range; yield point (MPA): 375≤510(N/mm^2); elongation: 22≤36(%);
if 2.0 mm to 2.49 mm thickness range; yield point (MPA): 365≤500(N/mm^2); elongation: 23≤37(%);
if 2.5 mm to 3.19 mm thickness range; yield point (MPA): 365≤500(N/mm^2); elongation: 23≤37(%);
if 3.2 mm to 3.99 mm thickness range; yield point (MPA): 355≤490(N/mm^2); elongation: 24≤38(%);
if 4.0 mm to 6.0 mm thickness range; yield point (MPA): 355≤490(N/mm^2); elongation: 24≤38(%);

Burring Test: 80% Min.

Response: **Domestic Producers object to the exclusion of this product. WCI can produce this within size capabilities.**

Variety 3:
Chemical composition: carbon content up to 0.20%, by weight; silicon content up to 1.20%, by weight; manganese content up to 2.30%, by weight; Phosphorus content up to 0.050%, by weight; sulfur content up to 0.020%, by weight; titanium content up to 0.20%, by weight;
physical & mechanical properties:
thickness range of 1.600 to 6.000 mm (inclusive); minimum tensile strength (MPA) of 590(N/mm^2);

if 1.6 mm to 1.99 mm thickness range; yield point (MPA): 460≤610(N/mm^2); elongation: 17≤31(%);
if 2.0 mm to 2.49 mm thickness range; yield point (MPA): 450≤600(N/mm^2); elongation: 18≤32(%);
if 2.5 mm to 3.19 mm thickness range; yield point (MPA): 450≤600(N/mm^2); elongation: 18≤32(%);
if 3.2 mm to 3.99 mm thickness range; yield point (MPA): 440≤590(N/mm^2); elongation: 19≤33(%);
if 4.0 mm to 6.0 mm thickness range; yield point (MPA): 440≤590(N/mm^2); elongation: 19≤33(%);

Burring Test: 80% Min.

Exclusion requested by: Nippon Steel Corporation[62]

Response: Domestic Producers object to the exclusion of this product. WCI can produce this within size capabilities.

Hot-rolled transformation-induced plasticity ("TRIP") steel (X-061 .9)

Product description: Three varieties of hot-rolled transformation-induced plasticity ("TRIP") steel:

Variety 1:
Chemical composition:
Carbon content up to .21%, by weight; Silicon content up to 2.2%, by weight; Manganese content up to 1.8%, by weight; Phosphorus content up to .025%; Sulfur Content up to .01%;

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62 Id.

Physical and mechanical properties: Thickness range from 1.4 to 6.0mm (inclusive); Minimum yield point (MPA) of 390; Minimum tensile strength (MPA) of 590; Minimum elongation of 25% if 1,400 mm to 1,999mm thickness range; minimum elongation of 26% if 2,000mm to 2,499mm thickness range; minimum elongation of 27% if 2,500mm to 3,249 mm thickness range; minimum elongation of 28% if 3,250mm to 3,999mm thickness range; minimum elongation of 28% if 4,000mm to 6,000mm thickness range.

Variety 2:
Chemical composition: Carbon content up to .23%, by weight; Silicon content up to 2.2%, by weight; Manganese content up to 2.0%, by weight; Phosphorus content up to .025%; Sulfur content up to .01%;
Physical and mechanical properties: Thickness range from 1.4 to 6.0mm (inclusive); Minimum yield point (MPA) of 440; Minimum tensile strength (MPA) of 690; Minimum elongation of 22% if 1,400 mm to 1,999mm thickness range; minimum elongation of 23% if 2,000mm to 2,499mm thickness range; minimum elongation of 24% if 2,500mm to 3,249 mm thickness range; minimum elongation of 25% if 3,250mm to 3,999mm thickness range; minimum elongation of 26% if 4,000mm to 6,000mm thickness range.

Variety 3
Chemical composition: Carbon content up to .25%, by weight; Silicon content up to 2.2%, by weight; Manganese content up to 2.2%, by weight; Phosphorus content up to .025%; Sulfur content up to .01%;
Physical and mechanical properties: Thickness range from 1.4 to 6.0mm (inclusive); Minimum yield point (MPA) of 490; Minimum tensile strength (MPA) of 780; Minimum elongation of 20% if 1,400 mm to 1,999mm thickness range; minimum elongation of 21% if 2,000mm to 2,499mm thickness range; minimum elongation of 22% if 2,500mm to 3,249 mm thickness range; minimum elongation of 23% if 3,250mm to 3,999mm thickness range; minimum elongation of 24% if 4,000mm to 6,000mm thickness range.

Exclusion requested by: Nippon Steel Corporation[63]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Battery quality hot-band (X-068)

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63 Id.

Product Description: Hot-rolled carbon steel flat product of a low carbon steel, aluminum killed SAE 1006 or equivalent containing max. 0.08% carbon, max. 0.45% manganese, .025% phosphorus, and .02% sulfur. The steel should be ultra-clean and capable of passing long-term battery storage, safety, and reliability tests. Individual particles of non-metallic inclusions shall not be greater than 1 micron and clusters or groups of non-metallic inclusions shall not exceed 5 microns in length.

Exclusion requested by: Eveready Battery Company[64]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Wide/extra-wide hot-rolled sheet and strip (X-072)

Product Description: There are two basic commercial width groups involved in this category of product: (1) hot-rolled sheet and strip that is 72" to 76" wide, and (2) hot-rolled sheet and strip that is 76" wide and wider.

Exclusion requested by: Corus Staal BV and Corus Steel USA Inc.[65]

Response: **Domestic Producers object to the exclusion of this product. IPSCO produces up to 96" wide coil and its U.S. steel mills are designed to produce the thicknesses required.**

Hot-rolled dual phase steel low silicon with tensile strength between 580 Mpa and 670 Mpa (X-075.1)

Product description: Hot-rolled dual phase steel, phase-hardened, primarily with a ferritic-martensitic microstructure, containing up to and including, 0.25 percent of silicon, 0.05 percent of phosphorous and 0.03 percent of sulfur by weight, further characterized by tensile strength between 580 Mpa and 670 Mpa, and an elongation percentage ≥ 24 percent.

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64 Exclusion request from Sonnenberg & Anderson on behalf of Eveready Battery Company (November 13, 2001)(Public Document).

65 Exclusion request from Steptoe & Johnson on behalf of Corus Staal BV and Corus Steel USA Inc. (November 13, 2001)(Public Version)

(UNIT: Thickness=mm, CHEM-CON=%)

Specification	Thickness (min)	Thickness (max)	Si (max)	P (max)	S (max)
DP600 or Equivalent	1.80	4.50	0.25	0.05	0.03

Specification of Yield Point and Tensile Strength (UNIT: YP & TS=Mpa)

SPEC	YP (min)	YP (max)	TS (min)	TS (max)
DP600	300	470	580	670

Specification of Elongation (UNIT: EL = %)

SPEC	EL (min)
DP600	24

Exclusion requested by: Mitsui & Co. (U.S.A.), Inc.[66]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

High yield ratio type hot-rolled high strength steel with tensile strength over 590 Mpa (X-075.2)

Specification: JSH 590R or Equivalent, Thickness (min 1.6mm - max 12.0mm), P (max 0.05), S (max 0.03), tensile strength 590 mpa

Thickness	Yield Strength	Elongation
1.6≤T<2.0	460-610 Mpa	17-31%
2.0≤T<2.5	450-600 Mpa	18-32%
2.5≤T<3.2	450-600 Mpa	18-32%
3.2≤T<4.0	440-590 Mpa	19-33%

66 Exclusion request from Kirkland & Ellis on behalf of Mitsui & Co. (U.S.A.), Inc. (November 13, 2001) (Public Version).

4.0≤T<6.3	440-590 Mpa	19-33%	6.3≤T<8.0
	430-580 Mpa	20- %	
8.0≤T<12.0	430-580 Mpa	20- %	

Exclusion requested by: Mitsui & Co. (U.S.A.), Inc.[67]

Response: **Domestic Producers object to the exclusion of this product. WCI can make this product and Gallatin Steel can produce this material at thickness' 2.0 mm and above.**

High yield ratio type hot-rolled high strength steel with tensile strength over 780 Mpa (X-075.3)

Specification: JSH 780R or Equivalent, Thickness (min 2.0mm - max 6.0mm), P (max 0.05), S (max 0.03), tensile strength 780 mpa

Thickness	Yield Strength	Elongation	
2.0≤T<2.5	685-835 Mpa	14-29%	2.5≤T<3.2
	685-835 Mpa	14-29%	
3.2≤T<4.0	675-825 Mpa	15-30%	
4.0≤T<6.3	675-825 Mpa	15-30%	

Exclusion requested by: Mitsui & Co. (U.S.A.), Inc.[68]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product.**

Hot Rolled Sheet in Coil (X-082)

Product Description: Hot rolled sheet in coil, not pickled, not oiled, less than 0.12 inch (3.0 mm) in thickness, less than 55 inches wide, in coils of greater than 1,000 PIW (pounds per inch of width), with a maximum flatness deviation measured as not to exceed 2.5% steepness ratio defined as height over the wave length), imported into Port of Kalama, Washington.

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67 Id.

68 Id.

Exclusion requested by: BHP Steel[69]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product. IPSCO is developing products that will satisfy these specifications. Geneva Steel does produce coil that meets the physical description in part B of the exclusion request. Geneva's coil weight in PIW is 975 pIW, which has been acceptable to Steelscape. Geneva Steel supplied Steelscape 9,675 tons in 2001. Geneva Steel has successfully provided steel meeting Steelscape's specification upon meeting various trials. Geneva has had in the recent market excess capacity and can fill all the orders for Steelscape that it is capable of producing. Geneva can and would produce up to 40,000 to 50,000 tons per months on an ongoing contractual basis which would exceed Steelscape's total historical requirements in hot rolled coils.**

Hot-rolled floor plate in widths greater than 60 inches (X-083.1)

Product description: Hot-rolled floor plate in widths greater than 60 inches normally imported under HTS number 7208.10.3000.

Exclusion requested by: Usinor, Arbed, and Aceralia[70]

Response: **Domestic Producers object to the exclusion of this product. Geneva Steel produces floorplate in widths greater than 60 inches in width. Geneva Steel is one of the only remaining domestic producers of floorplate in widths greater than 60 inches in width. Geneva Steel views floorplate as one of its best product lines. Geneva desires to sell more floorplate than it currently does. Geneva Steel uses the Inland/Ryerson floorplate pattern which has been the most popular floorplate pattern in the U.S.**

Hot-rolled floor plate with a thickness greater than 4.75 millimeters (X-083.2)

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69 Exclusion request from Wilmer Cutler & Pickering on behalf of BHP Steel (November 13, 2001) (Public Version).

70 Exclusion request from Shearman & Sterling on behalf of Usinor, Arbed, and Aceralia (November 13, 2001) (Public Version).

Product description: Hot-rolled floor plate with a thickness between 4.75 and 19.0 millimeters normally imported under HTS number 7208.10.3000.

Exclusion requested by: Usinor, Arbed, and Aceralia[71]

Response: **Domestic Producers object to the exclusion of this product. WCI may be able to make this product, but will need additional information on widths. Geneva Steel produces floorplate in thickness greater than 4.74 mm and less than 19.0 mm .187 to 0.750 inches in thickness. Geneva Steel is one of the only remaining domestic producers of floorplate in general and the only domestic producer of floorplate in widths greater than 60 inches in width. Geneva Steel views floorplate as one of its best product lines. Geneva desires to sell more floorplate than it currently does. Geneva uses the Inland/Ryerson floorplate pattern which has been the most popular floorplate in the U.S.**

Hot-rolled pickled and oiled quality A 606 T4 in grades 70, 90, or 100 (X-083.3)

Product description: Hot-rolled pickled and oiled quality A 606 T4 in grades 70, 90, or 100 normally imported under HTS number 7225.30.7000.

Exclusion requested by: Usinor, Arbed, and Aceralia[72]

Response: **Domestic Producers object to the exclusion of this product. WCI can produce this. Grade 70 is available domestically. Grades 90 and 100 are outside Gallatin's current capability, but are available from other domestic producers.**

In-line temper-passed and tension-leveled hot-rolled pickled and oiled flat-rolled products of iron and non-alloy steel (X-083.4)

Product description: In-line temper-passed and tension-leveled hot-rolled pickled and oiled flat-rolled products of iron and non-alloy steel normally imported under HTS numbers 7208.26.0060 and 7208.26.0070.

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71 Id.

72 Id.

Exclusion requested by: Usinor, Arbed, and Aceralia[73]

Response: **Domestic Producers object to the exclusion of this product. These products are available domestically. Additional information is required to comment further.**

High-nickel alloy hot-rolled plate (X-083.5)

Product description: High-nickel alloy hot-rolled plate normally imported under HTS numbers 7226.91.5000, 7226.91.7000, and 7225.40.3005. High-nickel alloy hot-rolled plate alloy compositions are in accordance with ASTM F15, ASTM F30 or ASTM F1684. Each of these specifications cover grades considered controlled or low-expansion alloys that are chosen for use based upon their coefficients of thermal expansion. This hot-rolled plate contains at least 24 percent nickel with widths less than or greater than 600 millimeters and thicknesses less than or greater than 4.75 millimeters. These products are primarily used by the electronics industry for the production of hybrid circuit boxes and the telecommunications industry for the production of hermetic fiber optic packages.

Exclusion requested by: Usinor, Arbed, and Aceralia[74]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

ASTM A606 Modified steel coils (X-089)

Product Description: ASTM A606 Modified steel coils, hot rolled, pickled and oiled for continuously milled coiled tubing products must meet the following specifications by having the listed chemical, mechanical, and physical properties:

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73 Id.

74 Id.

Chemical Properties: (Bracketed information is as it appears in the public version)

	C	Mn	S	Si	Cr	Cu	Ni	V	Mo	Fe
Min.	0.10	0.50	NA	NA	0.20	0.45	NA	NA	NA	BAL
Max.	0.20	1.00	0.01	0.50	0.70	0.40	0.30	0.02	0.50	BAL

Mechanical Properties:
55,000 psi. to 100,000 psi Yield Strength
75,000 psi. to 125,000 psi Tensile Strength
20% Minimum Elongation

Dimensional Properties:
Min. 25,000 lbs. original master coil weight

Exclusion requested by: Precision Tube Technology, Inc.[75]

Response: **Domestic Producers object to the exclusion of this product. ASTM A 606-4 is commercially available domestically. WCI can produce this product, but requires more information to understand modification.**

Hot rolled sheet pickled and oiled (X-099.1)

Product Description: Hot rolled sheet in coils, pickled and oiled; thickness more than 3 mm; ASTM A715 grades 045 and 080 and TRW raw material specification TRWMS30320361.

Exclusion requested by: Illinois Tool Works[76]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product.**

Hot rolled sheet pickled and oiled (X-099.2)

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[75] Exclusion request from Baker & Botts LLP on behalf of Precision Tube Technology, Inc. (November 13, 2001) (Public Version).

[76] Exclusion request from International Advisory Services Group, Ltd. on behalf of Illinois Tool Works (Nov. 13, 2001) (Public Document).

Product Description: Hot rolled sheet in coils, pickled and oiled; thickness less than 4mm; material shall meet the requirements of ASTM A568 in addition to the following requirements:

1. Material to be aluminum killed (fine grain practice), continuous cast and vacuum degassed.

2. Material to the free of defects detrimental to subsequent cold rolling and press forming.

3. Inclusion content (sulfides, alumina, silicates and oxides) to be no greater than rating #2 thin series per ASTM E 45. No heavy inclusions are permissible.

4. Microstructure to be fine pearlite with no more than 30% proeutectoid ferrite, with no carbide ferrite banding.

5. Grain size to be rating #5 or finer per ASTM E 112.

6. Total surface decarburization not to exceed 0.003 inch.

7. Hardness to be "within the limits of CIP Table C (Exhibit C) for the steel grade specified in the purchase order."

Exclusion requested by: Illinois Tool Works[77]

Response: Domestic Producers object to the exclusion of this product. WCI is able to make this product.

Hot rolled steel sheet pickled and oiled (thickness more than 3mm) (X-099.3)

Product Description: Hot rolled sheet in coils, pickled and oiled; thickness more than 3 mm, Rb. 85 Max.

Exclusion requested by: Illinois Tool Works[78]

Response: Domestic Producers object to the exclusion of this product. WCI is able to make this product.

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77 Id.

78 Id.

High strength low alloy hot rolled sheet (X-099.4)

Product Description: High strength low alloy, specified as SAE J1392 050 XLF with restricted manganese. This steel is used to make structural body mounts for light trucks and sport utility vehicles. The relationship of carbon and manganese content must be narrowly defined to allow elongation ranges above 35% while maintaining yield strength of 45,000 - 50,000 lbs. Components produced in the deep drawn stamping process are required to meet both column strength and shear integrity as defined by Ford Motor ES-F57A-1000192-AA Sections I, IIa, IIIa, IIIc, IIId, IIIf, & IIIi.

Exclusion requested by: Illinois Tool Works[79]

Response: Domestic Producers object to the exclusion of this product. WCI is able to make this product.

Hot rolled steel coils SAE 1006 DQSK (X-104)

Product Description: Certain hot rolled steel coils SAE 1006 DQSK with a width of 76.5 inches, plus or minus tolerances of +0.250/-0.000.

Exclusion requested by: Dana Corporation[80]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

SCM 415 (Modified) (X-142.19)

Product Description: C: 0.13% MIN - 0.18% MAX; Si: 0.15% MIN – 0.35% MAX; Mn: 0.60% MIN – 0.85% MAX; P: Equal to or less than 0.03%; S: Equal to or less than 0.03%; Cr: .90% MIN – 1.2% MAX; Mo: 0.15% MIN – 0.30% MAX; Yield Strength: equal to or exceeding 450N/mm^2; Tensile Strength: 580 N/mm^2 MIN – 700 N/mm^2 MAX; Elongation: equal to or exceeding 18%.

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79 Id.

80 Exclusion request from Barnes Richardson on behalf of Dana Corporation (November 13, 2001) (Public Version).

Exclusion requested by: Nippon Steel Corp., NAK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[81]

Response: **Domestic Producers object to the exclusion of this product. Chemical and physical requirements are within the capability of many North American producers, including [* *], Rouge, and WCI.**

SCM 415 (X-142.26)

Product Description: C: 0.13% Min – 0.18% Max; Si: 0.15% Min – 0.35% Max; Mn: 0.60% Min – 0.85% Max; P: equal to or less than 0.03%; S: equal to or less than 0.03%; Cr: 0.90% Min – 1.20% Max; Mo: 0.15% Min – 0.30% Max. This request falls under HTS numbers 7225.30.3050 and 7225.30.7000. This steel is used in manufacturing door latches to prevent automobile doors from opening in crashes and is also used in t.v. frames.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[82]

Response: **Domestic Producers object to the exclusion of this product. Chemical and physical requirements are within the capability of many North American producers, including [* *], Rouge, and WCI.**

Hot rolled bearing quality steel (X-142.15)

Product Description: Hot-rolled bearing quality steel, SAE grade 1050, in coils, with an inclusion rating of 1.0 maximum per ASTM E 45, Method A, with excellent surface quality and chemistry restrictions as follows: 0.012 percent maximum phosphorus, 0.015 percent maximum sulfur, and 0.20 percent maximum residuals including 0.15 percent maximum chromium.

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81 Exclusion request from Wilkie Farr & Gallagher on behalf of Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd. (November 13, 2001) (Public Version).

82 Id.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[83]

Response: **Domestic Producers object to the exclusion of this product. [* * * * * * * * * * * * * * * * * * * *], Rouge, and WCI are able to make this product.**

NST 490 for CRT frames (X-142.4)

Product Description: Hot rolled steel plate in coils. Size: 5.0MM x 533.5MM x Coil. C: 0.11% min - 0.17% max; Si: equal to or less than 0.10%; Mn: 0.30% min - 0.60% max; P: equal to or less than 0.025%; S: equal to or less than 0.025%; Mo: 0.20% min - 0.50% max; V: 0.04% min - 0.11% max; Al: 0.02% min - 0.08% max. Yield strength: equal to or exceeding 400N/mm^2. Tensile strength: 490 N/mm^2 min - 610 N/mm^2 max. Elongation: equal to or exceeding 22%.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[84]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product.**

ASTM A607 GR55 modified hot rolled steel (X-142.5)

Product Description: Certain hot-rolled steel of great hardness, heat-resistance and abrasion-resistance made to specification ASTM A607 GR55 modified, for further processing into OCTG pipe products, with chemical composition of (a) Ni:.10% max, (b) Cr: .55-.75%, (c) Mo: .106-.15%, (d) Cb: .02% min. or V: .04% min.

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83 Id.

84 Id.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[85]

Response: **Domestic Producers object to the exclusion of this product. Domestic mills are capable of supplying this grade. [* *], Rouge, Steel Dynamics, Inc., and WCI are able to make this product, but would require dimensional requirements as well as any other limitations.**

Hot-rolled anti-corrosion steel sheet (X-142.6)

Product Description: Chemical composition (%): C(.20 max), Si(1.2 max), Mn (2.00 max), P(.05-.1), S(.02 max), Cu (.15-.4), Ni (.4 max), Al(.1 max), Nb (.1 max), Ti (.1 max), V(.1 max), B(.1 max), Mo (.3 max); thickness: 1.6-6.0mm; tensile strength: 590 Mpa min.; and

Thickness	Yield Strength	Elongation	
1.6≤T<2.0	450-600 Mpa	19-35%	
2.0≤T<3.0	440-590 Mpa	20-36%	3.0≤T<6.0
	430-580 Mpa	21-37%	

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[86]

Response: **Domestic Producers object to the exclusion of this product. This product is available domestically to meet chemistry, strength, and dimensions. Gallatin Steel is capable of meeting these specifications. [* * * * * * * * * * * * * * * * * * * *] and WCI can also make this product.**

High-carbon hot-rolled alloy steel (X-142.7)

Product Description: High-carbon hot-rolled alloy steel is made to specifications SAE 8670 modified, SAE 4135 (modified), SAE 8660 (modified), SAE 4130 (modified), and JIS SCM 435.

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85 Id.

86 Id.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[87]

Response: **Domestic Producers object to the exclusion of this product. [* *], Rouge, and WCI are able to make this product. Additionally, Gallatin Steel reports that 4130 is available over 40"; other specifications require further review.**

Grade SAE 8667 Modified and Grade SAE 8667 - hot rolled pickled and oiled in coils (X-116.1)

Product Description: Grade SAE 8667 Modified and grade SAE 8667 hot rolled pickled and oiled steel in coils.

Exclusion requested by: Voestalpine Eurostahl[88]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product.**

ALFORM 700 (100,000psi) high strength low alloy hot rolled in coils (X-116.2)

Product Description: ALFORM 700 (100,000psi) high strength low alloy hot rolled seel in coils imported under the following HTS numbers: 7225.30.70.00 of thickness of less than 4.75mm in coils; 7225.30.30.50 of thickness of 4.75mm or more in coils; 7225.40.70.00 of a thickness of less than 4.75mm cut to length (not in coils); 7225.40.30.50 of a thickness of 4.75mm or more cut to length (not in coils).

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87 Exclusion request from Wilkie Farr & Gallagher on behalf of Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd. (November 13, 2001) (Public Version).

88 Exclusion request from Sharrets, Paley, Carter & Blauvelt, P.C. on behalf of Voestalpine Stahl GmbH (November 13, 2001)(Public Document).

Exclusion requested by: Voestalpine Eurostahl[89]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product. IPSCO will be developing Grade 100 products at its U.S. steel mills.**

ALFORM 760 (110,000psi) high strength low alloy hot rolled in coils (X-116.3)

Product Description: ALFORM 760 (110,000psi) high strength low alloy hot rolled in coils imported under the following HTS numbers: 7225.30.70.00 of thickness of less than 4.75mm in coils; 7225.30.30.50 of thickness of 4.75mm or more in coils; 7225.40.70.00 of a thickness of less than 4.75mm cut to length (not in coils); 7225.40.30.50 of a thickness of 4.75mm or more cut to length (not in coils).

Exclusion requested by: Voestalpine Eurostahl[90]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product. IPSCO will be developing Grade 100 products at its U.S. steel mills.**

ALFORM 890/900 (130,000psi) high strength low alloy hot rolled in coils (X-116.4)

Product Description: ALFORM 890/900 (130,000psi) high strength low alloy hot rolled in coils imported under the following HTS numbers: 7225.30.70.00 of thickness of less than 4.75mm in coils; 7225.30.30.50 of thickness of 4.75mm or more in coils; 7225.40.70.00 of a thickness of less than 4.75mm cut to length (not in coils); 7225.40.30.50 of a thickness of 4.75mm or more cut to length (not in coils).

Exclusion requested by: Voestalpine Eurostahl[91]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

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89 Id.

90 Id.

91 Id.

Hot rolled steel coils SAE 1050 (X-119.1)

Product Description: SAE-1050, hot-rolled steel coils from Compact Strip Production (CSP), as per the chemistry below, with an inclusion rating of 1.0 maximum per ASTM-E 45 method A, with excellent surface quality, internal cleanliness and superior shape and crown.

C .51-.55%, AIM .54%
Mn .75-.90%, AIM .78-.88%
P .012 max.
S .003 max.
Sl .15-.30%
Al .02-.07%
Cr .10% max.
Ni .06% max.
Cu .20% max.
.20% maximum residuals including Cr of .10% max.

Exclusion requested by: Thyssen Inc. of Detroit, Michigan[92]

Response: Domestic Producers object to the exclusion of this product. WCI can produce this using thick slab technology. Gallatin is also capable of providing this product.

Carbon and alloy hot rolled specialized hot rolled strip (X-119.2)

Product Description: High carbon, HSLA and alloy steel, pickled and oiled, black or annealed. Rolled from slab to final width as mill-edge product , in the grades stated below:

SAE 1022 through 1095 for cold-rolled strip
D6A, SAE 8660 through 4130 for seat belts
European grades such as 16MnCr5 for truck frame rails
Proprietary grades for machining and fine blanking

Size .060"-.630"

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92 Exclusion request from Sharretts, Paley, Carter & Blauvelt, P.C. on behalf of Thyssen Inc. of Detroit, Michigan (November 13, 2001)(Public Document).

Exclusion requested by: Thyssen Inc. of Detroit, Michigan[93]

Response: **Domestic Producers object to the exclusion of this product. Gallatin is capable of providing these products through grade 1055. Additional grades are available domestically. WCI can produce this using thick slab technology. With respect to D6A and SAE 8660 through 4130 for seat belts, IPSCO requires more detail to determine if it can produce the product in the United States.**

Hot rolled dual phase steel with mainly ferritic matrix with dispersed martensitic islands (X-122.1)

Product Description: Hot rolled dual phase steel with mainly ferritic matrix with dispersed martensitic islands characterized by either (I) tensile strength over 580 Mpa and elongation percentage over 24% for thicknesses up to 5.0mm, or (II) by a tensile strength over 530 Mpa and an elongation percentage over 25% for thicknesses up to 5mm.

Exclusion requested by: Thyssen Automotive Group of Detroit, Michigan[94]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Hot rolled complex phase steel with mainly fine grained ferritic-bainitic-martensitic microstructure (X-122.2)

Product Description: Hot rolled complex phase steel with mainly fine grained ferritic-bainitic-martensitic microstructure characterized by either (I) a tensile strength over 800 Mpa and elongation percentage over 10% for thicknesses up to 5.0mm, or (II) a tensile strength over 880 Mpa and an elongation percentage over 10% for thicknesses up to 4.0mm, or (III) a tensile strength over 950 Mpa and an elongation percentage over 10% for thicknesses up to 4.0mm.

Exclusion requested by: Thyssen Automotive Group of Detroit, Michigan[95]

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93 Id.

94 Id.

95 Id.

Response: **Domestic Producers object to the exclusion of this product. WCI may be able to produce this, but needs more information on the definition of "complex phase" steel.**

Hot rolled martensitic phase steel with mainly martensitic microstructure (X-122.3)

Product Description: Hot rolled martensitic phase steel with mainly martensitic microstructure characterized by either (I) a tensile strength over 1000Mpa and elongation percentage over 5% for thicknesses up to 3.5mm, or (II) a tensile strength over 1200 Mpa and an elongation percentage over 5% for thicknesses up to 4.0mm.

Exclusion requested by: Thyssen Automotive Group of Detroit, Michigan[96]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Hot rolled trip steel with mainly ferritic-bainitic matrix with dispersed residual austenite islands (X-122.4)

Product Description: Hot rolled trip steel with mainly ferritic-bainitic matrix with dispersed residual austenite islands with the following properties: tensile strength over 700Mpa and an elongation percentage over 25% for thickness between 1.6 and 5.0mm.

Exclusion requested by: Thyssen Automotive Group of Detroit Michigan[97]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

High carbon hot rolled steel (X-123)

Product Description: High carbon hot rolled steel, pickled and oiled, aluminum killed, fine grain practice, continuous cast and vacuum degassed, according to SAE 1050, modified as per following chemistry: C: .47 - .55; Mn: .60 - .75; P: .020 max.; S: .020 max.; Si: .10 - .20; Al: .060 max. Hardness: HRB 92-98. Inclusion content no greater than #2 thin series per ASTM A

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96 Id.

97 Exclusion request from Sharretts, Paley, Carter & Blauvelt, P.C. on behalf of Thyssen Automotive Group of Detroit, Michigan (November 13, 2001)(Public Document).

45. Microstructure to be fine perlite with no more than 30% proeutectoid ferrite, no carbon ferrite banding.
Grain size to be rated #5 or finer as per ASTM E112. Total surface decarburized not to exceed 0.003"

Exclusion requested by: Thyssen Steel Group of Fullerton, CA[98]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product.. Chemical specifications are available domestically. Dimensional specifications are needed.**

Certain hot rolled steel imported from POSCO and captively consumed (X-87 & X-139)

Product Description: Three categories of hot-rolled steel in coil imported under 7208.38.0030 and 7208.39.0030 from POSCOm with the following chemical composition:
C: .02~.05wt%
Mn: .20~.30wt%
Si: .02wt%
P: .020wt%
S: .020wt%
Max. nitrogen content: .0050wt%
Total Aluminum: .005-.030wt%

Category 1:
Usage: Re-rolling cold-rolled steel
PIW: 1000lbs. or greater
Width: between 24" and 56"
Gauge: greater than .08" but not more than .18"
Max. gauge variation compared to nominal gauge: +/-0.002"

Category 2:
Usage: Re-rolling corrosion-resistant steel
PIW: 1000lbs. or greater
Width: between 24" and 56"
Gauge: greater than .10" but not more than .18"
Max. gauge variation compared to nominal gauge: +/- 2%

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[98] Exclusion request from Sharretts, Paley, Carter & Blauvelt, P.C. on behalf of Thyssen Steel Group of Fullerton, CA (November 13, 2001)(Public Document).

Category 3:
Usage: Input for re-rolling tin plate
PIW: 1000lbs. or greater
Width: between 24" and 56"
Gauge: greater than .08" but not more than .10"
Max. gauge variation compared to nominal gauge: +/- 0.002"

Exclusion requested by: POSCO[99]

Response: Domestic Producers object to the exclusion of this product. The domestic industry can produce these products. WCI can produce in all three categories listed. More specifications are needed to comment regarding quality requirements.

Hot rolled strip coils in the annealed, pickled and oiled condition (X-172)

Product Description: Hot rolled strip coils in the annealed, pickled and oiled condition in the following ten product designations:

Item	Theis Grade	Product Designations	HTS
1	RM 37	AISI 1086 Modified (DIN 80W1 / 1525)	7211.19.6000
2**	RM 54	AISI 1095 Modified (DIN C100W / 1654)	7211.19.6000
3	RM 55	AISI 1095 Modified (100MnCrW4)	7211.19.6000
4	RM 61	AISI 6135 Modified	7226.91.7000
5	RM 72	AISI 6150 Modified	7226.91.7000
6	RM 73	AISI 9262 Modified (DIN 67SiCr5 /7103)	7226.91.8000
7	RM 78	DIN 2390 Modified (3% Cr)	7226.91.2560
8	RM 80	DIN 2390 Modified (3% Cr – 2% Mo)	7226.91.2560
9	RM 81	ASTM D6A	7226.91.1560
10	RM 86	ASTM D6A Modified	7226.91.1560

Theis is requesting exclusion in item 2 – RM54 – AISI 1095 modified for 250,000 lbs per month. Theis states that the balance of its needs can be satisfied by the US mills because the banding problem is not much a prevalent issue.

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[99] Exclusion request from Kaye Scholer LLP on behalf of Pohang Iron & Steel Co. Ltd. (POSCO)(November 16, 2001)(Public Version).

The products requested for exclusion by have critical performance requirements, which are best achieved with raw material that is absent of carbide banding in the microstructure.

Exclusion requested by: Theis Precision Steel Corp.[100]

Response: **Domestic Producers object to the exclusion of these products. [* * * * * * * * * * * * * * * * * * * *] is able to make this product according to all ten product designations. WCI can produce according to product designations 4, 5, and 7 and may be able to provide according to designation 1. With respect to designation 2, WCI will consent up to 125 TPM only, and with respect to designations 8 - 10, will consent only if specified as ingot cast product.**

Ultra-thin gauge hot-rolled sheet & strip

Product Description: Carbon steel ultra-thin gauge and High strength ultra-thin gauge hot-rolled sheet of 1.9 mm or below in thickness.

Exclusion requested by: Hylsa S.A. de C.V.[101]

Response: **Domestic Producers object to the exclusion of this product. As indicated in the request letter, the domestic industry can produce these products.**

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[100] Exclusion request from Theis Precision Steel Corp. (November 13, 2001) (Public Version).

[101] Exclusion request from Manatt Phelps Phillips on behalf of Hylsa, S.A. de C.V. (November 13, 2001)(Public Version).

Cold-Rolled Exclusion Requests

Certain steel strips (X-008)

Product Description: Steel strips in many different grades (1006 through 1095, Alloy steel 4140, 6153, High speed steel grade ABCIII & M2) and thickness ranging from .005 up to .21 inches. Characterized by: very thin material, as light as .005 inches think; very tight tolerances; different types of edge condition and surface finish; specific hardness and mechanical properties; and hardened and tempered material. Widths up to 20 inches only.

Exclusion requested by: Armco do Brasil S.A.[102]

Response: **Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet for grades 1006 through 1095 and for alloy steel 4140 and 6153. Cold-rolled conversion is available domestically.**

Certain blue finish band saw steel (X-010.1)

Product Description: Certain band saw steel, which meets the following characteristics: thickness less than or equal to 1.31 mm; width less than or equal to 80 mm; chemical composition: carbon content of 1.2 to 1.3 percent by weight; silicon content of 0.15 to 0.35 percent by weight; manganese content of 0.20 to 0.35 percent by weight; phosphorus content less than or equal to 0.03 percent by weight; sulphur content less than or equal to 0.007 percent by weight; chromium content of 0.30 to 0.5 percent by weight; and nickel content less than or equal to 0.25 percent by weight. Other properties: carbide: fully spheroidized having greater than 80 percent of carbides, which are less than or equal to 0.003 mm and uniformly dispersed; surface finish: blue finish free from pits, scratches, rust, cracks, or seams; smooth edges; edge camber (in each 300 mm of length) of less than or equal to 7 mm arc height; and cross bow (per inch of width) of 0.015 mm max.

Exclusion requested by: JB & S Lees[103]

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[102] Exclusion request from Armco do Brasil S.A. (November 13, 2001) (Public Document).

[103] Exclusion request from Cameron & Hornbostel on behalf of JB & S Lees (Nov. 9, 2001) (Public Version).

Response: **Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet, and cold-rolled conversion is available domestically.**

High carbon band saw steel (X-010.2)

Product Description: High carbon band saw steel with a carbon content (by weight) of .65 percent or more with a bright or blue finish.

Exclusion requested by: JB & S Lees[104]

Response: **Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet, and cold-rolled conversion is available domestically.**

Alloy band saw steel (X-010.3)

Product Description: Alloy band saw steel with a bright or blue finish and the following analysis:

Carbon:	0.33% min. by weight
Manganese:	0.60% min. by weight
Chromium:	0.80% min. by weight
Molybdenum:	0.40% min. by weight

Exclusion requested by: JB & S Lees.[105]

Response: **Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet, and cold-rolled conversion is available domestically.**

Textured rolled carbon steel (X-013)

Product Description: TRC is manufactured using a combination of a patenting heat treatment and a large cold rolling reduction using a 20-roll senzimer type rolling mill, resulting in the majority of the 111 crystal planes of the lattice lying in the direction of rolling. This texture enhances the resistance to fracture, giving a high fatigue strength. TRC has a high tensile strength of

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104 Id.

105 Id.

approximately 2,600 N/mm^2. The optimum properties are only realized by close control of the steel's composition, its internal cleanliness, the heat treatment, the cold rolling an the surface quality. TRC steel has a carbon content of 0.65 to 0.95 percent, a width of less than 200 mm.

Exclusion requested by: AvestaPolarit Oy[106]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Certain uncoated cold-rolled strip (grade C80M and 16MnCr5M2) (X-015.1)

Product Description: Certain uncoated cold-rolled strip (grade C80M and 16MnCr5M2) of a width less than 300 mm and a thickness exceeding 0.25 mm, produced to the following chemistries:

	C80M	16MnCr5M2
C	.70	.11
Si	.30	.20
Mn	.30	.85
P	.03	.025
S	.02	.01
P+S		.03
Cr	.35	.95
Cu	.10	.15
Ni	.20	.15
N		.01
Al	.02	.08
O_2	.001	
Ti	.003	
Sn	.01	

Exclusion requested by: INA USA Corporation[107]

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106 Exclusion request from Steptoe & Johnson on behalf of AvestaPolarit Oy (Nov. 12, 2001) (Public Version).

107 Exclusion request from Arent Fox on behalf of INA USA Corporation (Nov. 12, 2001) (Public Version).

Response: **Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet, and cold-rolled conversion is available domestically.**

Certain bonderized cold-rolled strip (X-015.2)

Product Description: C15M, MRST443, 16MnCr5M, and C16M bonderized strip of a width less than 300 mm and a thickness exceeding 0.25 mm produced to the following chemistries and coated (bonderized) on one side with a special phosphate coating:

	C15M	MRST443	16MnCr5M	C16M
C	.16	.10	.13	.20
Si	.20	.10	.20	.15
Mn	.40	.80	1.25	1.25
P	.025	.04	.02	.025
S	.020	.03	.01	.015
P+S			.03	.03
Cr	.30		1.2	.90
Cu	.30		.12	.15
Ni	.45		.15	.15
N		.007	.008	.009
Al	.15	.18	.08	.08

Exclusion requested by: INA USA Corporation[108]

Response: **Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet, and cold-rolled conversion is available domestically.**

ASTM A620C1 (X-034.1)

Product Description: 16GA 37.00-.187/-.000X COIL CRDQAK ASTM A620C1

Exclusion requested by: ATACO Steel Products Corporation[109]

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108 Id.

109 Exclusion request from ATACO Steel Products Corp. (Nov. 12, 2001) (Public Document).

Response: **Domestic Producers object to the exclusion of this product. WCI and [* *] are able to make this product.**

ASTM A620C1 (X-034.2)

Product Description: 16GA 40.00+.125-.00 X COIL CRDDQAK ASTM A620C1

Exclusion requested by: ATACO Steel Products Corporation[110]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* *] are able to make this product.**

ASTM A620C1 .055-.062 (X-034.3)

Product Description: 16GA 49.25 +.25-.00 X COIL CRDDQAK ASTM A620C1 .055-.062

Exclusion requested by: ATACO Steel Products Corporation[111]

Response: **Domestic Producers object to the exclusion of this product. WCI and [* *] are able to make this product.**

Battery grade cold roll (X-036)

Product Description:

Product 1: ASTM 625-76 D <Modified>
Certain full-hard cold-rolled continuously cast steel
(including tin mill black plate), which meets the following characteristics:
Chemical Composition, Weight %: C 0.02 - 0.06, Si < 0.03, Mn 0.20 - 0.40, P< 0.02, S < 0.023 (aim 0.018), Al 0.03-0.08 (aim 0.050), N 0.003 - 0.008 (aim 0.005).
Thickness Tolerance: +/- 5 percent guaranteed from 1.25" from width edge,
Width Tolerance: -0/+0.275", Flatness Deviation: ≤ 20 'I' units,
Transverse Curvature: ≤ 0.125", Hardness (HR30T): 53 +/-5;

Tensile Strength: 345-421N/mm2, Yield Strength: 345-421 N/mm2,

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110 Id.

111 Id.

Elongation: >= 30%; Lankford Value: 1.2 min., Grain size = 9-11,
Delta r value = less than +/- 0.2; Surface roughness
(RA- microinches): 8 to 24 (stone).

Inclusion level: SEM shall not reveal oxides greater than 1 micron. Inclusion groups or clusters shall not exceed 5 micron in length.

Applicable gauge and widths :
0.0082" nominal x 34.000"
0.0090" nominal x 32.700"
0.0102" nominal x 32.500"
0.0122" nominal x 34.375"
0.0122" nominal x 36.000"

Product 2: JIS G3141 - SPCE < modified>
Certain batch annealed and temper-rolled cold-rolled continuously cast steel (including tin mill black plate), which meets the following characteristics: Chemical Composition, Weight %: C <0.08, Si <0.04, Mn <0.40, P <0.03, S <0.03, Al 0.010-0.07. Thickness Tolerance: +/- 5 percent (aim +/4 percent), Guaranteed inside of 15 mm from mill edges, Width Tolerance: -0/+7 mm, Hardness (Hv): Hv 85-110, Tensile Strength: >275N/mm2; Elongation: >36%; Grain = equaixed; Grain size = min. 8.5; Lankford value: granter than 1.2; Delta r value = less than +/- 0.2.

Product 3: JIS 3141 - modified for battery cell application
Certain continuous annealed cold-rolled
continuously cast steel (including tin mill black plate), which meets
the following characteristics: Chemical Composition, Weight %:
C ≤0.08, Si ≤0.03, Mn ≤0.45, P ≤0.02, S ≤0.02, Al ≤0.08, As ≤0.02, Cu ≤0.05, N ≤0.004, Cr ≤0.05, Ni ≤0.05, Mo ≤0.01. Thickness Tolerance: +/- 5 percent guaranteed from 1.25" from width edge, Width Tolerance: -0/+ 0.275",
Flatness Deviation: ≤ 10 'I' units, Transverse Curvature: ≤ 0.118 ",
Hardness (HR15T): 76-82; Tensile Strength: 345-414 N/mm2, Yield Strength 241-310 N/mm^2, Elongation: ≥25%; Grain size (ASTM) = 9-11,
Delta r value = less than +/- 0.2; Surface roughness (RA- microinches): 10 - 20.

Nonmetallic Inclusions: ≤0.20 pcs./ m2 as measured by IDD (Internal Defect Detector) instrument designed by Toyo Kohan.

Exclusion requested by: Worthington Steel[112]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Cold-rolled enameling steel with niobium (X-042)

Product Description: Certain cold-rolled steel sheet, whether coated or not coated with porcelain enameling prior to importation, meeting the following characteristics:

Thickness: 0.040" to 0.060" minimum
Width: 58 to 70 inches
Chemical Composition: C: (Max. weight 0.002%)
O: (Min. weight 0.018%)
Nb: (Min. weight 0.025%)

Exclusion requested by: Mitsubishi International Steel Inc.[113]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Docol Cold Rolled Products (USTR Nos.X-46 & X-120)

Product Description: Docol dual phase steels and Docol matensitic steels imported in product grades Docol 85 DP, Docol 85 DL, Docol 100 DP, Docol 100 W Docol 115 DP, Docol 115 DL, Docol 130, Docol 130 M, Docol 140 DP, Docol 145 Dp, Docol 145 DL, Docol 160, Docol 160 M, Docol 175 DP, Docol 190, Docol 190 M, Docol 205 DP, Docol 220, Docol 220M, Docol 400 DP, Docol 500 DP, Docol 600 DP, Docol 600 DL, Docol 800 DP, Docol 800 DL, Docol 1000 DP and Docol 1000 DL. All Docol grades covered by this exclusion request fall within grade SAE 2340.
Mechanical Properties and Dimensions:

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112 Exclusion request from Worthington Steel (Nov. 12, 2001) (Public Document).

113 Exclusion request from Gibson, Dunn on behalf of Mitsubishi International Steel Inc. (Nov. 13, 2001) (Public Version).

DOCOL	Yield Strength min.	Tensile Strength min.	Elongation %	Bendability	Thickness Range	Width Range
85 DP	50	85	17	0xt for 180°	.197”-.078”	31”-60”
85 DL	40	85	21	0xt for 180°	.197”-.078”	31”-60”
100 DP	80	100	12	1xt for 90°	.197”-.078”	35”-60”
115 DP	72	115	9	1xt for 90°	.197”-.078”	31”-60”
115 DL	56	115	14	1xt for 90°	.197”-.078”	31”-60”
130 M	80	130	8	4xt for 180°	.197”-.078”	35”-60”
140 DP	80	140	8	3xt for 90°	.197”-.078”	35”-60”
145 DP	100	145	6	3xt for 90°	.197”-.078”	31”-60”
145 DL	72	145	9	3xt for 90°	.197”-.078”	31”-55”
160 M	130	160	4	4xt for 90°	.197”-.078”	35”-49”
175 DP	137	175	4	4xt for 90°	.197”-.078”	35”-49”
190 M	150	190	4	4xt for 90°	.197”-.078”	35”-49”
205 DP	167	205	3	4xt for 90°	.197”-.078”	35”-49”

220 M	180	220	3	4xt for 90°	.197”-.078”	35”-49”
100 W	100	130	5	2xt for 90°	.197”-.078”	31”-60”
450 Wear*	165	205	3	4xt for 90°	.197”-.078”	35”-49”

* This steel has a 450 Brinell hardness, Hb

	Docol 450 Defend
Hardness	450 Hv
Thickness Range	0.039"-0.078"
Width Range	35"-49"

Chemical Composition: TV=typical values

DOCOL	C TV	Si TV	Mn TV	P max.	S max.	Nb TV	Al TV	Cu TV	Cr TV	Micro Alloying Elements
85 DP	.11	.20	.70	.05	.01		.04			
85 DL	.10	.40	1.5	.01	.01		.04			
100 DP	.13	.20	1.5	.020	.004	.015	.04			
115 DP	.13	.20	1.5	.002	.002	.015	.04			
115 DL	.14	.20	1.7	.015	.002	.015	.04			
130 M	.07	.20	1.8	.020	.004		.04			
140 DP	.15	.50	1.5	.020	.004	.015	.04			

145 DP	.15	.20	1.5	.015	.002	.015	.04			
145 DL	.18	.20	1.6	.015	.002	.015	.04			
160 M	.09	.20	1.7	.020	.004	.015	.04			
175 DP	.11	.20	1.6	.015	.002		.04			
190 M	.13	.20	1.7	.020	.004	.015	.04			
205 DP	.17	.50	1.6	.015	.002	.015	.04			
220 M	.20	.20	1.5	.025	.004	.015	.04			
100 W	.13	.50	1.2	.02				.04	.05	Added
450 Wear*	.17	.50	1.6	.01	.010	.015	.04			
450 Defend	.17	.50	1.6	.015 (TV)	.002 (TV)	.015	.04			

Exclusion requested by: Cargill Ferrous International[114] and SSAB Tunnplat AB[115]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

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[114] Exclusion request from Cargill Ferrous International (November 12, 2001) (Public Document).

[115] Exclusion request from Hunton & Williams on behalf of SSAB Tunnplat AB (November 13, 2001) (Public Version).

Shadow/aperture mask steel (X-054)

Product Description: (1) G material: aluminum killed cold-rolled steel coil that has increased tensile strength of 800 to 1200 N/mm2, ultra-flat, and which meets the following characteristics: thickness .001 to .010inch, width 15 to 35 inches, chemical composition : carbon content less than 1 % by weight, nitrogen content in the range .01-.017 percent by weight, and manganese content in the range .6-.85% by weight.

(2) Invar: Certain aperture mask iron-nickel low thermal expansion Invar-type alloy used exclusively for manufacturing shadow/aperture masks, which has an ultra-flat surface and which meets the following characteristics: thickness: .001 to .010 inch, width: 15 to 35 inches, chemical composition nickel content in the range 30.0-37.0 percent, by weight, cobalt content up to 5.0 percent, by weight, sulfur content not more than .0030 percent by weight. Thermal expansion coefficient not more than 1.5 x 10-6/0C.

Exclusion requested by: BMC Industries, Inc.[116]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Non-oriented steel ("NOES") with insulation coating, NSC Models MS-4K and MS-7 (X-061.2)

Product description: Defined as NSC Models MS-4K and MS-7, "high-induction low core loss fully-processed NOES products with semi-organic insulation coating for stress relief annealing usage." The technical specifications for these specialty NOES products are included below.

[116] Exclusion request from BMC Industries, Inc. (November 13, 2001) (Public Version).

NSC Model Number	Maximum Core Loss -- After SRA (w/kg at 15/50)*	Minimum Induction (B50)	Typical Hardness (Hv)	Chemical Contents (silicon, manganese, aluminum)	Coating**
MS-4K	5.00	1.73	110	Si max 0.3, Mn max 0.5, Al min 0.5	semi-organic insulation coating
MS-7	3.50	1.70	124	Si max 1.3, Mn max 0.5, Al min 1.0	semi-organic insulation coating

* SRA (Stress Relief Annealing) condition: 750 C° x 2 hours under non-oxidixing atmosphere.

** Coating: Semi-organic insulation coating, whose composition is an inorganic base substance including an organic substance, is used to improve both production efficiency and motor core properties. The organic contents of the insulation improve punching quality, machinability, and weldability. The inorganic contents of the insulation improve insulation and prevent lamination sticking after annealing

Exclusion requested by: Nippon Steel Corporation[117]

Response: Domestic Producers object to the exclusion of this product. WCI is able to make this product.

Wide high-precision cold-rolled steel (X-061.5)

Product Description: Wide high-precision cold-rolled steel with the following characteristics:
(1) Mechanical Properties:
TS≥50KSI, YP≥32KSI, EL≥33%, 60≤HRB≤75

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[117] Exclusion request from Gibson, Dunn & Crutcher LLP on behalf of Nippon Steel Corporation (November 13, 2001) (Public Version).

(2) Major Chemical Contents:
Carbon: .13% or less
Manganese: .60% or less
Phosphorous: .03% or less
Silicon: .04% or less
Sulfur: .03% or less
(3) Thickness: .07" to .09", width tolerance of +/- .0008"
(4) Width: 36" to 49"
(5) Roughness: .4umRA or less (RA: average roughness)

Exclusion requested by: Nippon Steel Corporation[118]

Response: **Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet, and cold-rolled conversion is available domestically.**

Di Octyl Sebacate ("DOS") Oil-Coated Cold-Rolled Steel (X-061.14)

DOS oil-coated cold-rolled steel is a specialized product used exclusively for the manufacture of drum bodies and parts. It has restricted specifications regarding oil and mechanical properties, which are in conformity with CR1 of ISO3574(-84). There are two kinds of specifications for this product that NSC seeks to have excluded:

A366-97 for drum body
(1) Size
Thickness: 0.0159" to 0.0508"
Width: 28" to 50-7/16"
(2) Main Chemical Elements
Carbon: 0.02 - 0.08%
Manganese: 0.60 or less
Phosphorous: 0.030% or less
Sulfur: 0.025% or less
(3) Mechanical Properties
TS greater than or equal to 39 KSI
YP less than or equal to 38 KSI
EL greater than or equal to 30%
48≤HRB≤56
(4) Gauge Accuracy: 1/4 ASTM

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118 Id.

(5) Oiling: Very fine layer (5 to 15mg/m2) of DOS oil good for direct painting

A366-97 for drum top and bottom

(1) Size
Thickness: 0.0159" to 0.0533"
Width: 32-3/4" to 59"

(2) Main Chemical Elements
Carbon: 0.02 - 0.08%
Manganese: 0.50 or less
Phosphorous: 0.025% or less
Sulfur: 0.025% or less

(3) Mechanical Properties
TS greater than or equal to 39 KSI
YP less than or equal to 37 KSI
EL greater than or equal to 32%
48≤HRB≤51

(4) Gauge Accuracy: 1/4 ASTM

(5) Oiling: Very fine layer (5 to 15mg/m2) of DOS oil good for direct painting

The key physical characteristics of DOS Oil-Coated Cold-Rolled Steel distinguishing it from other forms of cold-rolled steel is that it can be painted directly without going through the process of electrical cleaning. This feature is obtained by rolling the steel with organic solution at NSC's skin pass mill ("SPM") and oiling it with a very fine(5 to 15mg/m2 for one product, and 5 to 15mg/m2 for the other), uniformly coated layer of DOS oil. Usually, oil coated steel sheets need to be electrically cleaned (i.e., cleaned of oil) before being moved onto the next processing stage. But because this product is oiled so finely and uniformly, this additional step is rendered unnecessary.

Exclusion requested by: Nippon Steel Corporation[119]

Response: Domestic Producers object to the exclusion of this product. The domestic industry can supply these products. WCI can produce and coat with DOS oil.

ASTM A677/A677M-99 (X-077.1)

Product Description: ASTM A677/A677M-99 fully processed electrical steels with a minimum of 0.5% silicon content and maximum core loss of up to 0.24 watts per mil.

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119 Id.

Exclusion requested by: Emerson Electric Co.[120]

Response: **Domestic Producers object to the exclusion of this product. WCI can make this product (except 6.5% Si).**

Cold rolled motor lamination steels (ASTM A726-00) (X-077.2)

Product Description: Cold rolled motor lamination steels, ASTM A726-00.

Exclusion requested by: Emerson Electric Co.[121]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Semi-processed silicon electrical steels (X-077.3)

Product Description: Semi-processed silicon electrical steels, ASTM A683/A683M-99.

Exclusion requested by: Emerson Electric Co.[122]

Response: **Domestic Producers object to the exclusion of this product. WCI is able to make this product.**

Flat rolled products of high nickel alloy steel (X-083.1)

Product description: Flat rolled products of high nickel alloy steel - not further worked than cold rolled. Alloy compositions are according to ASTM F15, ASTM F30, ASTM B753, and ASTM F1684, for controlled expansion alloys. Alloys are according to ASTM B753 or ASTM A801 for magnetic alloys. All of these alloys contain at least 14 percent nickel or 25 percent cobalt with or without other elements. Widths may be either less than or greater than 600 millimeters and thicknesses may be either less than or greater than 4.75 millimeters.

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120 Exclusion request from Bryan Cave LLP on behalf of Emerson Electric Co. (November 13, 2001) (Public Version).

121 Id.

122 Id.

Exclusion requested by: Usinor, Arbed, and Aceralia[123]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Cold-rolled flat rolled products of iron and non-alloy steel in high carbon qualities (X-083.2)

Product description: Cold-rolled flat rolled products of iron and non-alloy steel in high carbon qualities and widths greater than 36 inches imported under HTS numbers 7209.16.0030, 7209.16.0060, 7209.17.0030, 7209.17.0060, 7209.18.1530, 7209.18.1560.

Exclusion requested by: Usinor, Arbed, and Aceralia[124]

Response: **Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet, and cold-rolled conversion is available domestically.**

Ds Type B (DS-B), DDQAK, fire extinguishing grade, C1008 Modified ASTM A-620 (X-084)

Product Description: Cold rolled steel with a light matte surface. The chemical composition is .04 to .08 carbon, thickness is .030 to .115 inches.

Exclusion requested by: Larson Tool and Stamping Company[125]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Full hard cold rolled coil for hot-dipped galvanizing (X-096)

Product Description: Cold-rolled full hard is a non-annealed product designed as the basic input for hot-dipped galvanized sheet. It must be less than 0.13 inches in thickness and between 27 and 57 inches in width. For thicknesses less than or equal to 0.017 inches, there must be zero edge wave. It must have a

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123 Exclusion request from Shearman & Sterling on behalf of Usinor, Arbed, and Aceralia (November 13, 2001) (Public Version).

124 Id.

125 Exclusion request from Larson Tool & Stamping Company (November 13, 2001) (Public Document).

light matte (30-80AA) surface finish and a carbide structure suitable for lock forming after galvanizing. This request is for exclusion of full-hard that is imported by Pinole Point Steel through the ports of Richmond and Oakland, California.

Exclusion requested by: BHP Steel and MSC Pinole Point Steel Inc.[126]

Response: Domestic Producers object to the exclusion of this product. This product can be produced domestically and is commercially available. WCI is able to make this product.

Low carbon cold rolled steel (X-099.1)

Product Description: Low carbon cold rolled sheet in coils; less than .050 thickness; ASTM A1008 DS and DDS used in the production of automotive braking components and other safety related products.

Exclusion requested by: Illinois Tool Works[127]

Response: Domestic Producers object to the exclusion of this product. WCI is able to produce this product.

High strength low alloy cold rolled sheet (X-099.2)

Product Description: Cold rolled sheet in coils; .064 ASTM A715 grade 50 HSLA

Exclusion requested by: Illinois Tool Works[128]

Response: Domestic Producers object to the exclusion of this product. WCI is able to make this product.

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126 Exclusion request from Wilmer Cutler & Pickering on behalf of BHP Steel and MSC Pinole Point Steel (November 13, 2001) (Public Version).

127 Exclusion request from International Advisory Services Group, Ltd. on behalf of Illinois Tool Works (Nov. 13, 2001) (Public Document).

128 Id.

Low carbon cold rolled steel (X-099.3)

Product Description: Low carbon cold rolled sheet in coils, greater than 0.080 thick, #5 DDQ.AK. 55HRB MAX. ITW Anchor Stampings produces deep drawn components required to meet Ford Motor ES- F57A-1000192-AA Sections I, IIa, IIIc, IIId, IIIf, and IIIi.

Exclusion requested by: Illinois Tool Works[129]

Response: Domestic Producers object to the exclusion of this product. WCI can make this product.

Woodband saw steel (X-110.1)

Product Description: Woodband saws used for cutting timber and making lumber characterized by:

Width 4.125" (104.8mm) to 16.250" (412.8mm)
Thickness: Gage-20BWG (.89mm) to Gage - 11 BWG (3.05mm)
Grade: 15LM (C-1074 Carbon and 15N2)
Internal Specification # 634 6062 Rev 4

Chemical Properties:

for smaller sizes and Dim 231.8 x 1.47, 231.8 x 1.65, 231.8 x 1.73, 206.4 x 1.47, 231.8 x 1.83: Sandvik 15LM (AISI 1074, W-Nr 1.1248): C=.75%, Si=0.2%, Mn=0.75%

For larger sizes: Sandvik 15N2: C=0.75%, Si=0.25%, Mn=.35%, Ni=2.0%

i. Inclusions: Pipe: Code 1 = approved, Code 2-4 not approved.

ii. Decarburization: Complete decarburization is not allowed and the maximum total decarburization is 4% of the strip thickness.

iii. Surface: The surface finish is bright and polished

iv. Surface defects: Materials with surface defects that can serve as indication of the fractures are not approved. Surface defects with round, smooth outlines (such as roll marks) can be allowed. Maximum approved scratch depth for longitudinal scratches are 10m.

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[129] Id.

v. Edges: The edges are square and smooth.

vi. Mechanical Properties:

Thickness	Tensile Strength N/mm^2	Hardness HCR
-1.83mm or -0.072 inch	1450 +/- 80	42-46
1.83- or 0.072-	1350 +/- 60	40-43

vii. Microstructure: A matrix of very fine needled, tempered martensite with a uniform distribution of small undissolved carbides.

viii. Surface Roughness (Cut off .8mm):

Thickness	Max Ra
mm	um
-1.20	0.25
1.20-1.50	1.0
1.50	1.5

Maximum Ra difference of .5 um between surface.

xi. Shape: The maximum unflatness is 0.10% of the nominal strip width. Multishift is 0.07% of the nominal strip width. The maximum coilset is 10mm/m.

x. Dimensional tolerances: thickness tolerance = T1, Multishift=T2. With a strip the maximum allowed difference between the maximum and minimum size is half the tolerance zone for T1. For Multishift T2. The width is Standard B1 and for multishift, B2. The width is 5 1/8" to 16 1/4". Thickness is .078" to 18 BWG.

xi. Flatness: The maximum allowed unflatness is .20% of the nominal strip width measured across and along the rolling direction. The unflatness shall be measured with the strip lying under its own weight on a flat surface and shall exclude the influence of residual stresses from the slitting.

Exclusion requested by: Sandvik Steel Company[130]

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[130] Exclusion request from Hunton & Williams on behalf of Sandvik Steel Company (November 13, 2001)(Public Version).

Response: **Domestic Producers object to the exclusion of this product. WCI may be able to supply hot-rolled sheet, but more information is needed. Cold-rolled conversion is available domestically.**

Flapper Valve Steel (X-110.2)

Product Description: Wide width coils of 6" to 14" and slit to finished sizes and used for flapper valve applications such as refrigeration, freezing, and air conditioning industries, gas processing and transportation, heat pumps and industrial compressors.
Characterized by:
a. high bending and impact fatigue strength
b. high purity
c. good flatness and surface finish
d. good blanking properties
e. excellent thickness tolerances
width: 6" (152.4mm) to 14"(355.6mm)
thickness: .004" (.102mm) to .025" (.635mm)
Grade: 20C (C-1095)
Internal specification 634 6760 Rev 0

Chemical composition:
C .95-1.05%
Si .2-.35%
Mn .35-.6%
P max. .020%
S max. .010%

Non-metallic inclusions: The area percentage of non-metallic inclusions in the strip material will be:
Maximum:
Oxide inclusions: .01%
Sulfide inclusions: .03%

Surface defects: surface defects (e.g. pits and roll marks):
Thicknesses up to and including .508mm (≤.020 inch): A small number of surface defects with a depth or height of maximum 2µm (80µ") is allowed. Thicknesses over .508mm up to and including 1.2 mm (>.020" - ≤.047"): A small number of surfaces defect with a depth or height of maximum 3 µm (120 µ").

Thickness		Max allowed depth	
mm	inch	µm	µ"
≤.203	≤.008	.5	20
>.203-≤.508	>.008- ≤.020	.8	32
>.508-≤1.20	>.020-≤.047	1.0	40

Thickness		Tensile Strength		
mm	inch	Mpa	psi	Corresp. Hardness, Figures, Vickers (HV, approximate values)
<.125	<.005	2100	305,000	615
.125-<.175	.005-<.007	2050	297,000	600
.175-<.225	.007-<.009	2000	290,000	590
.225-<.275	.009-<.011	1950	283,000	575
.275-<.375	.011-<.015	1900	276,000	560
.375-<.425	.015-<.017	1850	268,000	550
.425-<.475	.017-<.019	1800	261,000	535
.475-<.625	.019-<.025	1750	254,000	520
.625-<.825	.025-<.033	1700	247,000	510
.825-<1.150	.033-<.045	1650	239,000	495
1.150-<1.200	.045-<.047	1600	232,000	480

Tolerance on the tensile strength: +/- 80 N/mm2 (+/- 11,500psi)

Microstructure: A matrix of very fine needled, tempered martensite with a uniform distribution of small undissolved carbides.

v. Surface roughness: maximum allowable surface roughness, measured with a cut off length of .25mm (.01 inch):

Thickness		Ra			Rmax
mm	inch	m	µ"	µm	µ"
≤.508	≤.020	.13	5.2	1.5	60
>.508-≤1.2	>.020-≤.047	.25	10	2.5	100

Dimensional tolerances:

Thickness		Tolerances	
mm	inch	width	thickness
>.381	≤.015	B1	T3
>.381-.508	≤.015-≤.020	B1	T2
>.508-1.2	>.020-≤.047	B1	T1

Flatness: The maximum allowed unflatness in .20% of the nominal strip width measured across and along the rolling direction. The unflatness is measured with the strip lying under its own weight on a flat surface and shall exclude the influence of residual stresses from the slitting.

Exclusion requested by: Sandvik Steel Company[131]

Response: Domestic Producers object to the exclusion of this product. WCI is able to supply 1095 grade hot-rolled sheet. Cold-rolled conversion is available domestically.

Shock absorber and doctor blade steel (X-110.3)

Product Description: Shock absorber steel is used by purchasers to manufacture valves used in automotive shock absorbers. This product specification covers hardened and tempered high carbon strip steel in thicknesses from .102mm (.004") up to and including .508mm (.020") intended for the manufacturing of valve plates in shock absorbers. Doctor blade steel is identical to shock absorber steel except that it is slit and cut to different sizes for the different application. Wide width coils of .5" to 14" and slit to finished sizes.

Chemical composition:

C	.95-1.05
Si	.20-.35
Mn	.35-.50
P	max. .020
S	max. .010

Surface defects (e.g. pits and roll marks): A small number of surface defects with a depth or height of maximum 5 µm (200µ") is allowed.

Scratches: The maximum depth of scratches allowed is 2.0µm (80µ")

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131 Id.

Microstructure: A matrix of very fine needled, tempered martensite with a uniform distribution of small undissolved carbides.

Tensile Strength and hardness: The tensile strength and the hardness vary with the material thickness.

Thickness		Tensile Strength		Corresp. Hardness figures, Vickers (HV. Approximate values)
mm	inch	N/mm2	psi	
.102	.004	2100	305,000	615
.114	.0045	2100	305,000	615
.127	.0050	2050	297,000	600
.152	.006	2050	297,000	600
.178	.007	2000	290,000	590
.203	.008	2000	290,000	590
.254	.010	1950	283,000	575
.305	.012	1900	276,000	560
.356	.014	1900	276,000	560
.381	.015	1850	268,000	550
.406	.016	1850	268,000	550
.457	.018	1800	261,000	535
.508	.020	1750	254,000	520
.600	.0236	1750	254,000	520

Tolerance on the tensile strength +/- 80 N/mm2 (+/- 11.5psi)

Surface roughness: The maximum allowable surface roughness, measured with a cut off length of .25mm (.01 inch) is Ra .13 µm (5.2µ") and Rmax 1.5 µm (60µ")

Dimensional Tolerances:

Thickness		Tolerances	
mm	inch	width	thickness
</.6	</.0236	B1	T3

Flatness: The maximum allowed unflatness is .30% of the nominal strip width measured across and along the rolling direction.

Straightness: Out-of -straightness is stated in millimeters and is defined as the maximum deviation of the edge from a straight line.

The straightness tolerance is R2:

Strip width		Max. Allowed unstraightness	
mm	inch	mm/m	inch/3 feet
≥8-<20	≥.315-<787	2.0	.072
≥20-<50	≥.787-<1.969	1.5	.054
≥50-<125	≥1.696-<4.921	1.25	.045
≥125-	≥4.921-	1.0	.036

Exclusion requested by: Sandvik Steel Company[132]

Response: Domestic Producers object to the exclusion of this product. WCI may be able to supply hot-rolled sheet, but more information is needed. Cold-rolled conversion is available domestically.

Cement kiln H/T steel (X-110.4)

Product Description: Grade 13C cement kiln steel.
Chemical composition weight -
C .65%
Si .25%
Mn .65%
P .020%
S .010%

Microstructure : Fine grained and homogeneous. Matrix of tempered martensite with a small amount of undissolved carbides.
Decarburization: No free ferrit is allowed. Total decarburization should not exceed 4% per plane.
Mechanical properties: tensile strength: 1200-1700 Nmm2
(Standard 1280 +/- 80 N/mm2)
Surface finish: Grey hardened condition. Ra/CLA - max .25m. Cut off .25mm. Rmax -max 2.5m
Edge condition: slit edges free from cracks and damages
Dimensions:
Thickness .4 - 1.4 mm Tolerance T1

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132 Id.

Width : 250-1200 mm Tolerance B1
Flatness: unflatness across the strip: max .4% of the nominal strip width
Coil size: Inside diameter 600mm Coil weight max 6.5 kg/mm strip width.

Exclusion requested by: Sandvik steel Company[133]

Response: **Domestic Producers object to the exclusion of this product. WCI may be able to supply hot-rolled sheet, but more information is needed. Cold-rolled conversion is available domestically**

Cold rolled steel for battery jackets (X-142.1)

Product Description: Certain batch annealed and temper-rolled cold-rolled continuously cast steel (including tin mill black plate), which meets the following characteristics: Chemical Composition, Weight %: C<.08, Si<.04, Mn<.4, P<.03, S<.03, Al .010-.07. Thickness tolerance: +/5 percent (aim +/4 percent), Guaranteed inside of 15mm from mill edges, width tolerance: -0/+7mm, Hardness (Hv): Hv 85-110, Tensile Strength: >275N/mm²; Elongation: >36%; Grain=equiaxed; Grain size=min. 8.5; Lankford value: greater than 1.2; Delta 'r' value=less than +/- .2.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[134]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Non-oriented, high silicon, magnetic steel sheet (X-142.2)

Product Description: (A) Non-oriented, high silicon, magnetic steel sheet with the following characteristics: thickness (0.00196-0.00787" or 0.05-0.20mm); width (0.7874-23.622" or 20-600 mm); chemical composition (by weight %): C (max 0.010), Mn (max 0.15), P (max 0.015), S (max 0.005), Si

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133 Id.

134 Exclusion request from Wilkie Farr & Gallagher on behalf of Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd. (November 13, 2001) (Public Version).

(min 5.0, max 7.0), Al (max 0.004); mechanical properties: hardness of 380-420 μ HV (micro vickers); magnetic properties: magnetostriction (< 1.0 x 10-6 (λ 10/400 magnetostriction at 400 Hz, 1T(=10 kg)).

(B) Non-oriented, high silicon, magnetic steel sheet with the following characteristics: silicon density gradient of between 4 wt% (center) and 6.5 wt% (surface); thickness (0.00196-0.01181" or 0.05-0.30mm); width (0.7874-23.622" or 20-600 mm); chemical composition (by weight %): C (max 0.010), Mn (max 0.15), P (max 0.015), S (max 0.005), Si (min 4.0, max 7.0), Al (max 0.004); mechanical properties: hardness of 380-420 μ HV (micro vickers); magnetic properties: (strikethrough: saturation induction over 1.85 Tesla) (core loss (strikethrough: W1/10k < 20.4W/kg,) W.5/20k < 24.0 W/kg).

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[135]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Ultra flat cold rolled steel (X-142.3)

Product Description: Coiled tin mill black plate for automotive brakeline tubing, per ASTM A625 specification, vacuum degassed, with the following ladle anlysis: .02-.05% carbon, .18-.45% (aim .30%) manganese, .015% maximum phosphorus, .025% maximum sulfur, .10% maximum copper, and .02-.075% aluminum. The gauge is .0136 inch, with centerline gauge tolerance of .0003 inch and within-coil variation not to exceed .0004 inch total and the crown of the coil shall not exceed .0004 inch when measured along any straight line across the width of the coil. Other physical characteristics are as follows: T1 or T3 temper, 52-62 Rockwell for T3 or 45-52 for T1, continuously annealed (for T3 only), 25-65 microinch Ra profilometer range; matte surface finish; camber per ASTM A625 (aiming ½ Standard tolerance); slit edge minus 0, + 1/8 maximum, and edge burr .002 inch maximum.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[136]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

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135 Id.

136 Id.

Cold-Rolled Steel for Porcelain Enameling (X-142.4)

Product Description: Certain cold-rolled steel sheet, whether coated or not coated with porcelain enameling prior to importation, which meets the following characteristics: Thickness (nominal) > = 0.019 inch; Width: 35 to 60 inches; chemical composition: C (max weight 0.004%), O (min weight 0.010%), B (min weight 0.012%).

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[137]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

High frequency low core loss NOES (X-142.5)

Product Description: Non grain-oriented silicon steel with nominal thickness 0.2mm (0.0080 in.), which can achieve low core loss less than 8.16 watts per pound at 400Hz. Mill proprietary grades are 20MHF1200, 20MHF1500 and 20 MHF1800.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[138]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Ultra high strength cold rolled steel sheet (X-142.6)

Product Description: This exclusion request is for ultra high strength cold-rolled steel sheet. The HTS numbers are 7209.16.00.30, 7209.18.15.30, and 7209.18.25.50. "The most important characteristic of this product is the combination of hardness and good formability."

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137 Id.

138 Id.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[139]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

High carbon cold-rolled steel (X-142.7)

Product Description: 1. Grade: Cold-rolled sheets in coil, SAE 1050, SAE 1075 and SAE 1074, spheriodized annealed, with: surface: light matte finish, thickness: .010"-.0915", width: 36" – 52", edge: slit edge, weld: no weld, coil I/D: 20", coil O/D: 60" max

Thickness Tolerance (Center of Sheets):
+/- .00025" for thickness from .010" to less than .015"
+/- .00030" for thickness from .015" to less than .025"
+/- .00040" for thickness from .025" to less than .0915"

Cleanliness: rating 1.0 max by ASTM E45, Method-A. Restricted Carbon range: .02 points.

2. Carbon content of .45% or higher, with sphereodized annealing, and with thickness tolerance (center of sheets) of +/- 5% or –0%/+10% and; (1) HRB hardness maximum of 85 for grade SAE 1050, or (2) HRB hardness maximum of 90 for grade SAE 1070 or SAE 1075.

3. SAE 8660 (modified):
C: .66 - .7%, Si: .2-.35%, Mn: .35-.45%, P: 0-.020%, S: 0-.005%, Cu: 0-.05%, Ni:.65-.8%, Cr :.45-.55%, Mo: .11-.15%, V: 0-.01%, Al : .02-.04%, Ti: .015-.025%, Nb: 0-.010%, (for all contents, Min/max both inclusive.)

4. SAE 1074 (modified):
C: .7-.78%, Mn:.6-.7%, P: Equal to or less than .020%, S: Equal to or less than .01%, Non-Metallic inclusion content by ASTM-E45: 1.0 Max, (for all contents, Min/Max both inclusive)

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139 Id.

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[140]

Response: Domestic Producers object to the exclusion of this product. WCI is able to make this product.

Band saw steel (142.8)

Product Description: Nominal thickness: 1.07mm≤T≤3.05mm Width: 130mm<W<413mm Chemical composition: C: (0.67-0.80), Si: (0.20-0.35), Mn: (0.30-0.50), Ni: (1.90-2.20), Cr: (0.10-0.20), P: (≤0.03), S: (≤0.015), Cu: (≤0.15).

Exclusion requested by: Nippon Steel Corp., NKK Corp., Kawasaki Steel Corp., Sumitomo metals Indus., Kobe Steel, Ltd., Nisshin Steel Co., Japan Iron & Steel Exporters' Assn., and Suzuki Metal Indus., Ltd.[141]

Response: Domestic Producers object to the exclusion of this product. WCI can supply hot-rolled sheet, and cold-rolled conversion is available domestically.

Cold rolled enameling steel (X-119.1)

Product Description: Open coil annealed decarburized, low carbon cold-rolled steel, continuous cast according to ASTM A424 type 1, as per the chemistry below.

C	.008 max.
Mn	.40 max.
P	.020 max.
S	.030 max.

Exclusion requested by: Thyssen, Inc. of Detroit, Michigan[142]

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140 Id.

141 Id.

142 Exclusion request from Sharretts, Paley, Carter & Blauvelt, P.C. on behalf of Thyssen, Inc. of Detroit, Michigan (November 13, 2001)(Public Document).

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Cold rolled enameling steel (X-119.2)

Product Description: Carbon and alloy cold-rolled deep drawing enameling steel to ASTM A 424 type 3, interstitial-free, as per the chemistry below.

Carbon	.02 max.
Titanium	.051 max.
Manganese	.35 max.
Phosphorus	.020 max.
Sulfur	.030 max.

Surface roughness 90-120 microinches, dry (no oil on surface), hardness 24-45 Rb.

Exclusion requested by: Thyssen. Inc. of Detroit, Michigan[143]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Cold-rolled dual phase steel (X-122.1)

Product Description: Cold-rolled dual phase steel with dispersed mainly ferrite matrix martensitic islands. Characterized by either (I) tensile strength over 500 Mpa and an elongation percentage over 25% for thicknesses up to 1.5mm, or (II) by a tensile strength over 600 Mpa and an elongation percentage over 18% for thicknesses up to 2.0mm.

Exclusion requested by: Thyssen Automotive Group of Detroit, Michigan[144]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Cold-rolled trip steel (X-122.2)

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143 Id.

144 Exclusion request from Sharretts, Paley, Carter & Blauvelt, P.C. on behalf of Thyssen Automotive Group of Detroit, Michigan (November 13, 2001) (Public Document).

Product Description: Cold-rolled trip steel with mainly ferritic-bainitic matrix with dispersed residual austenite islands. Characterized by either (I) tensile strength over 600 Mpa and an elongation percentage over 26% for thicknesses up to 1.5mm, or (II) with a tensile strength over 700 Mpa and an elongation over 24% for thicknesses up to 2.0mm, or (III) with a tensile strength over 800 Mpa and an elongation percentage over 22% for thicknesses up to 1.5mm.

Exclusion requested by: Thyssen Automotive Group of Detroit, Michigan[145]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Cold-rolled PM phase steel (X-122.3)

Product Description: Cold-rolled partially martensitic steel with a ferrite matrix containing a martensitic phase up to 50%. Characterized by tensile strength over 780 Mpa and elongation percentage over 24% for thicknesses up to 1.45mm.

Exclusion requested by: Thyssen Automobile Group of Detroit, Michigan[146]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Cold rolled and black plate steel (X-143)

Product description: HTS 7225.50.8085 cold rolled and black plate steel purchased from Japan through Maruben-Itochu America, including a slightly more restricted specification of ASTM -A625 (single-reduced black plate .0141 inches thickness and less) and of specification ASTM -A619 (cold-rolled drawing quality steel .0142 inches thickness or more).

Exclusion requested by: Columbian Home Products, LLC[147]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

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145 Id.

146 Id.

147 Exclusion request from Columbian Home Products, LLC (November 13, 2001) (Public Document).

SAE 1095 cold-rolled steel sheet and strip (X-145 and X-155)

Product Description: Cold-rolled steel sheet and strip; specification SAE 1095; surface finish: Brite No. 2; Rockwell hardness: RC 21 - RC 30; decarburization: .0005" maximum; thickness tolerance:

Thickness	Gauge Tolerance
0.0235"	+/- 0.0005"
0.017"	+/- 0.0005"
0.035"	+/- 0.001"

Exclusion requested by: Cold Metal Products, Inc.[148]

Response: **Domestic Producers object to the exclusion of this product. WCI may be able to supply hot-rolled sheet, but more information needed. Cold-rolled conversion is available domestically.**

[148] Exclusion request from Wilkie, Farr & Gallagher on behalf of Cold Metal Products, Inc. (November 13, 2001) (Public Version).

Corrosion Resistant Exclusion Requests

Certain Bonderized Cold-Rolled Strip (X-015)

Product Description: Cold-rolled strip of a width less than 300 mm and a thickness exceeding 0.25 mm produced to the following chemistries and coated (bonderized) on one side with a special phosphate coating. The chemistries for each grade are defined as follows:

- 16MnCr5M2: C (.13), Si (.20), Mn (1.25), P (0.020), S (0.01), P+S (0.03), Cr (1.2), Cu (0.12), Ni (0.15), N (0.008), Al (0.08).
- C15M: C (.16), Si (0.20), Mn (0.40), P (0.025), S (0.020), Cr (0.30), Cu (0.30), Ni (0.45), Al (0.15).
- MRST443: C (0.10), Si (0.10), Mn (0.80), P (0.04), S (0.03), N (0.007), Al (0.18).
- C16M: C (0.20), Si (0.15), Mn (1.25), P (0.025), S (0.015), P+S (0.03), Cr (0.90), Cu (0.15), Ni (0.15), N (0.009), Al (0.08).

Exclusion requested by: INA USA Corp.[149]

Response: **Domestic Producers object to the exclusion of this product. WCI may be able to supply hot-rolled sheet, but more information is needed. Cold-rolled conversion is available domestically.**

Galfan (X-048)

Product Description: RAGAL® GALFAN is the brand name of Rautaruukki's zinc-aluminum coated products. The GALFAN coating consists of 95% zinc and 5% aluminum. Dimensions and surface quality varies.

Exclusion requested by: Rautaruuki Oyj[150]

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149 Exclusion request from Arent Fox Kitner on behalf of INA USA Corp. (November 12, 2001) (Public Document).

150 Exclusion request from Holland & Knight on behalf of Rautaruukki Oyj (November 13, 2001) (Public Document).

Response: **Domestic Producers object to the exclusion of this product. Weirton can produce this product except in thicknesses between 0.021"-0.030" or width greater than 42 inches.**

CORE Alloy for Precision Press Parts (X-061.4)

Product Description: Alloy sheet electrolytically coated with either pure zinc or zinc-nickel and is used in the production of laser beam printer parts. The product comes with two thickness parameters as follows: variety 1 = thickness of 0.6 mm or more but less than 1.0 mm, with a thickness tolerance of +/- 0.05 mm; variety 2 = thickness of 1.0 mm or more but less than 1.6 mm, with a thickness tolerance of +/- 0.04.

Exclusion requested by: Nippon Steel Corp.[151]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Highly Lubricative ("L-Treated") Corrosion Resistant Steel (X-061.7)

Product Description: L-Treated CRS is a patented product consisting of certain electrogalvanized or hot-dipped zinc-iron annealed coated steel that is treated with a highly Lubricative film (typically with a thickness of 0.01μ m) containing manganese and phosphorous. Has excellent lubricative performance in an oiled condition; the L-treated film does not adversely affect phosphating treatment by an automotive panel phosphating agent; L-treatment so thin it does not affect the weldability of these steel sheets; may be used for galvanized steel sheets; and the formability range of the steel sheets is widely expanded by the L-treatment.

Exclusion requested by: Nippon Steel Corp.[152]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Terne Plate (X-061.10)

Product Description: Coated steel product that is plated or coated with both steel and lead, primarily used to manufacture automotive fuel tanks and chassis for home appliances.

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151 Exclusion request from Gibson, Dunn & Crutcher on behalf of Nippon Steel Corporation (November 13, 2001) (Public Document).

152 Id.

Exclusion requested by: Nippon Steel Corp.[153]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

AS-E Corrosion Resistant Steel (X-061.11)

Product Description: Corrosion-resistant steel with a two layer coating compose of (1) a base coating layer of zinc-based, zinc-iron alloy (achieved by a hot-dip galvanizing process), and (2) a surface coating layer of iron-zinc alloy (achieved by an electro-galvanizing process), having an effective amount of zinc up to 40% by weight. There are two patents on this product, and one is on AS-E Corrosion Resistant Steel produced by using an electroplating sulfate liquid containing special additives in addition to iron and zinc ions. Requirements include:

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM340HR-45/45. Minimum Tensile Strength: 340. High Elongation/Formability: High Rankford Value. Coating Weight: 30/60. Master Coil Size: 0.85 mm x 600 mm x 1500 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 45. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Weight: 45. Master Coil Size: 0.80 mm x 1400 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 30/60. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Weight: 30/60. Master Coil Size: 0.80 mm x 1400 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 45. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Mass: 45/m^2. Master Coil Size: 0.80 mm x 1400 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 60/30. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Weight: 60/30. Master Coil Size:

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153 Id.

0.80 mm x 1400 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM340HR- 50/60. Minimum Tensile Strength: 340. High Elongation/Formability: High Rankford Value. Coating Weight: 60/80. Master Coil Size: 1.40 mm x 1540 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Galvanneal Coated Steel Coil. Material Grade SCGM270F - 30/60. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Weight: 30/60. Master Coil Size: 0.70 mm x 1565 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270D - 30/60. Minimum Tensile Strength: 270. Degree of Formability: D. Coating Weight: 30/60. Master Coil Size: 0.90 mm x 1580 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270D - 30/60. Minimum Tensile Strength: 270. Degree of Formability: D. Coating Weight: 30/60. Master Coil Size: 0.90 mm x 1565 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 30/60. Minimum Tensile Strength: 270. Degree of Formability: D. Coating Weight: 30/60. Master Coil Size: 0.90 mm x 1566 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270D - 60/30. Minimum Tensile Strength: 270. Degree of Formability: D. Coating Weight: 60/30. Master Coil Size: 0.90 mm x 1560mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270D - 60/30. Minimum Tensile Strength: 270. Degree of Formability: D. Coating Weight: 60/30. Master Coil Size: 0.90 mm x 1565 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM340HR - 45/45. Minimum Tensile Strength: 340. High Elongation/Formability: High Rankford Value. Coating Weight: 45/45. Master Coil Size: 0.80 mm x 1555 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM340HR - 45/45. Minimum Tensile Strength: 340. High Elongation/Formability: High Rankford Value. Coating Weight: 45/45. Master Coil Size: 0.85 mm x 900 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 30/60. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Weight: 30/60. Master Coil Size: 0.70 mm x 1560 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM340HR-0- 30/60. Minimum Tensile Strength: 340. High Elongation/Formability: High Rankford Value. Coating Weight: 30/60. Master Coil Size: 0.75 mm x 1350 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM340HR- 30/60. Minimum Tensile Strength: 340. High Elongation/Formability: High Rankford Value. Coating Weight: 30/60. Master Coil Size: 0.80 mm x 736 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 30/60. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Weight: 30/60. Master Coil Size: 0.70 mm x 1560 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 30/60. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Weight: 30/60. Master Coil Size: 0.85 mm x 1395 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

- ASE Iron Flash Cold Rolled Galvannealed Multi-Coat. Material Grade SCGM270F - 30/60. Minimum Tensile Strength: 270. Degree of Formability: F. Coating Weight: 30/60. Master Coil Size: 0.80 mm x 1675 mm. Coated Layer Composition Tolerance Target: Iron = 80%, Zinc = 20%. Coated Layer Composition Tolerance Inner: Iron = 10%, Zinc = 90%.

Exclusion requested by: Nippon Steel Corp.[154]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

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154 Id.

Thin Gauge AS Corrosion Resistant Steel (X-061.12)

Product Description: Product is a hot-dipped, zinc-iron annealed, coated carbon steel product, used in the production of automotive outer and inner panels.

- Tensile strength of 390 Mpa or more
- Yield strength ranging from 195 Mpa through 295 Mpa
- r-value of 1.2 or more
- elongation ranging from 34% through 45%
- thickness of 1.4 mm or less

Exclusion requested by: Nippon Steel Corp.[155]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

ASE Iron Flash Steel Coils (X-065)

Product Description: This product falls under HTS number 7210.49.0090, and is known commercially as ASE Iron Flash. The product is two layer-coated corrosion-resistant steel with coating composed of (1) a base coating layer of zinc-based zinc-iron alloy by hot-dip galvanizing process, and (2) a surface coating layer of iron-zinc alloy by electro-galvanizing process, having an effective amount of zinc up to 40% by weight. Dimension data are bracketed and not publicly available; Toyota claims certain dimensions are not produced domestically, but does not disclose these.

Exclusion requested by: Toyota Motor Manufacturing North America[156]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Single Reduced Electrolytically Chromium- or Tin-Coated Steel (X-075.1)

Product Description: Gauges: 0.0045 inch nominal, 0.0050 inch nominal, 0.0061 inch nominal (55 pound base box weight), regardless of width, temper, finish, coating or other properties.

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155 Id.

156 Exclusion request from Hogan & Hartson on behalf of Toyota Motor Manufacturing North America, Inc. (November 13, 2001) (Public Document).

Exclusion requested by: Mitsui and Co.[157]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Alloy Aluminized Steel Sheet in Coil. AASTM A463, Type 1 (X-075.10 and 135)

Product Description: ASTM A463, type 1, DQ, T1-25 coating, non-chromated, tension leveled, no stencil. This product falls under HTSUS category 7225.99.0090. It has a .023" minimum x 47.8125" x Coil Aluminized Steel Coil, T125, CQ. ASTM A463, latest edition extra smooth; temper rolled, reduction to be 1.25% or more tension leveled; flatness to be .125" max. deviation in 2.5 feet electrostatic oiling; 75 MG each side max.. No "sag" or "header" lines. No surface defects. 20-24" coil ID; 20,000 lb. Max. coil weights. Material must enamel without "blisters" or visible surface defects.

Exclusion requested by: Mitsui & Co.[158]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Cold-Rolled Carbon Steel Strip with Aluminum Cladding on Each Side (X-104.ex1)

Product Description: Steel consumer requirements are ST3 LG per DIN 1624/1544. The width of the aluminum cladding is less than ten percent of the total thickness of the material. HTS number is 7212.60.0000. The cladding and the ratio are the most important characteristics that differentiate this merchandise from other merchandise.

Exclusion requested by: Dana Corp.[159]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

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157 Exclusion request from Kirkland & Ellis on behalf of the Mitsui & Co. (U.S.A.), Inc. (November 13, 2001) (Public Document).

158 Amendment to Exclusion request from Kirkland & Ellis on behalf of Mitsui & Co. (U.S.A.), Inc. (November 14, 2001) (Public Document).

159 Exclusion request from Barnes Richardson on behalf of Dana Glacier Daido America, LLC (November 13, 2001) (Public Document).

ASTM A 463 DDS - Aluminized Steel (X-104.ex2)

Product Description: Commonly known as aluminum coated cold rolled carbon steel sheet, or aluminized steel (titanium killed). Seeks exclusion only for products that are 0.012 inch gauge, including industry standards for tolerances of plus or minus ten percent. HTS number is 7225.99.0090. The distinguishing characteristic of this product is the gauge that is sought to be excluded - only the 0.012 inch gauge product.

Exclusion requested by: Dana Corp.[160]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Aluminum Clad Steel Strips in Coils (X-104.ex3 & X-107)

Product Description: Dana's clad aluminum to steel strip is a proprietary product. Imported in coil form, under HTS 7212.60.0000. Dimensions: overall thickness = minimum of and including 1.10 mm to a maximum of and including 4.90 mm; overall width = minimum of and including 76.00 mm to a maximum of and including 250.00 mm. Composition: Steel Back (SAE 1005): C = under 0.10 percent; Mn = under 0.40 percent; P = under 0.04 percent; S = under 0.05 percent; Si = under 0.05 percent. Aluminum Cladding: Cu = under 2.51 percent; Sn = under 15.10 percent; Pb = under 2.0 percent; Sb = under 0.50 percent; Si = under 3.0 percent; Total other: less than 1.25 percent (including iron); Al = remainder.

Exclusion requested by: Dana Corp.[161]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Heat-Shrinkable ("HS") Band (X-111)

Product Description: The technical specifications of coated steel sheet for reinforcement bands are:

(1) Mechanical Properties

(1-1) Yield Strength: 26 - 41 kg/mm^2

(1-2) Tensile Strength: 41 - 65 kg/mm^2

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[160] Exclusion request from Barnes Richardson on behalf of Dana Glacier Daido America, LLC (November 13, 2001) (Public Document).

[161] Id.

(2) Magnetic Property: 350 and more
(3) Coating
(3-1) Main coating: Pure zinc or zinc-nickel
(3-2) Additional coating: Chromate only or chromate and chemical coating. (Modified chromate coating is also used.)

Exclusion requested by: Japanese Respondents[162]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Electro-Galvanized Alloy Steel Product (X-111)

Product Description: Electro-galvanized alloy steel processed through continuous annealing line meeting the following specifications: (a) containing boron of 0.0020% to 0.0035%, (b) containing carbon of 0.03% to 0.06%, (c) Rockwell hardness of 45-60, (d) thickness of 0.0138" with tolerance of ± 0.0015".

Exclusion requested by: Japanese Respondents[163]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Hot-Dipped Galfan DQSK in Coils (X-116f)

Product Description: Hot-Dipped Galfan (Zinc 5% Aluminum Alloy Coated) DQSK in Coils per VALEO Spec. NVA 15007 VOEST Grade THM220ZA in the dimensions 0.78mm (.031 nom.) x 1204mm (47.415") and 0.99mm (.039") x 1125mm (44.3"). The product falls under HTS category 7210.49.00.90.

Exclusion requested by: Voestalpine Stahl GmbH[164]

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[162] Exclusion request from Wilkie Farr & Gallagher on behalf of various Japanese respondents (November 13, 2001) (Public Version).

[163] Id.

[164] Exclusion request from Sharetts Paley on behalf of Voestalpine (November 13, 2001) (Public Document).

Response: **Domestic Producers object to the exclusion of this product. Weirton can produce this product except in thicknesses between 0.021"-0.30" or width greater than 42 inches.**

Hot-Dipped Bonderized Commercial Quality in Coils (X-116g)

Product Description: Hot-Dipped Bonderized Commercial Quality in Coils (ASTM 653, G90, Phosphated, Dry) in a thickness of 0.53mm (.021" nom.) and 0.48mm (.019" nom.); both gauges in a width of 1219mm (48"). The product falls under HTS category 7210.49.00.90.

Exclusion requested by: Voestalpine Stahl GmbH[165]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Galvanized Dual Phase Coated Steel Sheet (X-146)

Product Description: Ragal®LitecDPF is the brand name of Rautaruukki's hot dip galvanized dual phase steel. Low alloy steel with a multiphase microstructure, of which there are five steel grades, with thicknesses ranging from 0.70 to 1.60 mm and with tensile strengths from 600 to over 1000 N/mm^2. Coatings and coating weights: zinc between 100 - 350 g/m^2 and 7 -25 pm, and galfan between 95 -300 g/m^2 and 7 -23 pm.

Exclusion requested by: Rautaruukki Oyj[166]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Chromate-free corrosion resistant steel (X-176)

Product Description: A corrosion resistant steel product electrolytically coated with either pure zinc or zinc nickel and including a chromate-free coating. The specifications also include a yield strength of 26-41 kg/mm^2, a tensile strength of 41-65 kg/mm^2, and a magnetic property of 350 or more.

Exclusion requested by: Sony Electronics, Inc.

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165 Id.

166 Exclusion request from Holland & Knight on behalf of Rautaruukki Oyj (November 13, 2001) (Public Document).

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Chromate-free corrosion resistant steel (X-181)

Product Description: Chromate-free corrosion resistant steel is an electrogalvanized (either pure zinc or zinc-nickel) or hot-dipped galvanized or precoated steel product that is coated with a coating that is completely chromate-free (that is, the coating does not contain Cr3+ or Cr6+).

Exclusion requested by: Confidential[167]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

[167] Exclusion request from Gibson Dunn & Cruthcer (November 13, 2001) (Public Document).

Tin Mill Exclusion Requests

Electrolytically Tin Coated Steel (X-039-1)

Product Description: Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents in the lighter side (detailed below), with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.7 mg/square foot of chromium applied as a cathodic dichromate treatment, with coil form having restricted oil film weight of 0.3-0.4 grams/base box of type DOS-A oil, coil inside diameter ranging from 15.5 to 17 inches, coil outside diameter of a maximum 64 inches, with a maximum coil weight of 25,000 pounds, and with temper/coating/dimension combinations of: (1) CAT 4 temper, 1.00/0.050 pound/base box coating, 70 pound/base box (0.0077 inch) thickness, and 33.1875 inch ordered width; (2) CAT 5 temper, 1.00/0.50 pound/base box coating, 75 pound/base box (0.0082 inch) thickness and 34.9375 inch or 34.1873 inch ordered width; (3) CAT 5 temper, 1.00/0.50 pound/base box coating, 107 pound/base box (0.0118 inch) thickness, and 30.5625 inch or 35.5625 inch ordered width; (4) CADR 8 temper, 1.00/0.50 pound/base box coating, 85 pound/base box (0.0093 inch) thickness, and 35.5625 inch ordered width; (5) CADR 8 temper, 1.00/0.25 pound/base box coating, 60 pound/base box (0.0066 inch) thickness, and 35.9375 ordered width; (6) CADR 8 temper, 1.00/0.25 pound/base box coating, 70 pound/base box (0.0077 inch) thickness, and 32.9375 inch, 33.125 inch, or 35.1875 inch ordered width.

Exclusion requested by: Maui Pineapple Co.[168]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Electrolytically Tin Coated Steel (X-039-2)

Product Description: Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents on the lighter side (detailed below), with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.5 mg/square foot of chromium applied as a cathodic dichromate treatment, with ultra flat scroll cut sheet form, with CAT 5 temper with 1.00/0.10 pound/base box coating, with a lithograph logo printed in a uniform pattern on the 0.10 pound coating side with a clear protective coat, with both sides waxed to a level of 15-20 mg/216 sq. in., with ordered dimension combinations of (1) 75 pound/base box (0.082 inch) thickness and 34.9375 inch x 31.748 inch scroll cut dimensions; or (2) 75 pound/base box (0.0082) inch thickness and 34.1875 x 29.076 inch scroll cut dimensions; or (3) 107 pound/base box (0.0118 inch) thickness and 30.5625 inch x 34.125 inch scroll cut dimension.

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[168] Exclusion request from Collier Shannon Scott on behalf of Maui Pineapple Co., Ltd. (November 13, 2001) (Public Document).

Exclusion requested by: Maui Pineapple Co.[169]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Laminated Tin Free Steel (X-061.3 and X-075.3)

Product Description: Tin free steel laminated on one or both sides of the surface with a polyester film, consisting of two layers (an amorphous layer and an outer crystal layer), that contains almost none of the following environmental hormones: BADGE (BisPhenol – A Di-glycidyl Ether), BFDGE (BisPhenol – F Di-glycidyl Ether), and BPA (BisPhenol – A).

Exclusion requested by: Nippon Steel Corp.[170] and Mitsui and Co.[171]

Response: Domestic Producers object to the exclusion of this product. Weirton is developing a substantially similar product which it hopes to market within the next year.

Ultra Wide Tin Free Steel (X-061.6)

Product Description: Tin free steel in gauges 75 lb. to 112 lb. per base box, single reduced, continuously annealed, in widths equal or exceeding 40 inches.

Exclusion requested by: Nippon Steel Corp.[172]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

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169 Id.

170 Exclusion request from Gibson, Dunn & Crutcher on behalf of Nippon Steel Corp. (November 13, 2001) (Public Document).

171 Exclusion request from Kirkland & Ellis on behalf of the Mitsui & Co. (U.S.A.), Inc. (November 13, 2001) (Public Document).

172 Exclusion request from Gibson, Dunn & Crutcher on behalf of Nippon Steel Corp. (November 13, 2001) (Public Document).

Electrolytically Tin-Coated Steel (X-061.13-1)

Product Description: Having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents in the lighter side, with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.7 mg/square foot of chromium applied as a cathodic dichromate treatment, with coil form having restricted oil film weights of 0.3-0.4 grams/base box of type DOS-A oil, coil inside diameter ranging from 15.5 to 17 inches, coil outside diameter of a maximum 64 inches, with a maximum coil weight of 25,000 pounds, and with temper/coating/ dimension combinations of: (1) CAT 4 temper, 1.00/.050 pound/base box coating, 70 pound/base box (.0077 inch) thickness, and 33.1875 inch ordered width; or (2) CAT 5 temper, 1.00/.050 pound/base box coating, 75 pound/base box (.0082 inch) thickness, and 34.9375 inch or 34.1875 inch ordered width; or (3) CAT 5 temper, 1.00/.050 pound/base box coating, 107 pound/base box (.0118 inch) thickness, and 30.5625 inch or 35.5626 inch ordered width; or (4) CADR8 temper, 1.00/.050 pound/base box coating, 85 pound/base box (.0093 inch) thickness, and 35.5626 inch ordered width; or (5) CADR8 temper, 1.00/.25 pound/base box coating, 60 pound/base box (.0066 inch) thickness, and 35.9375 inch ordered width; or (6) CADR8 temper, 1.00/.25 pound/base box coating, 70 pond/base box (.0077 inch) thickness, and 32.9375 inch, 33.125 inch, or 35.1875 inch ordered width.

Exclusion requested by: Nippon Steel Corp.[173]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Electrolytically Tin-Coated Steel (X-061.13-2)

Product Description: Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents on the lighter side (detailed below), with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.5 mg/square foot of chromium applied as a cathodic dichromate treatment, with ultra flat scroll cut sheet form, with CAT 5 temper with 1.00/0.10 pound/base box coating, with a lithograph logo printed in a uniform pattern on the 0.10 pound coating side with a clear protective coat, with both sides waxed to a level of 15-20 mg/216 sq. in., with ordered dimension combinations of (1) 75 pound/base box (0.082 inch) thickness and 34.9375 inch x 31.748 inch scroll cut dimensions; or (2) 75 pound/base box (0.0082) inch thickness and 34.1875 x 29.076 inch scroll cut dimensions; or (3) 107 pound/base box (0.0118 inch) thickness and 30.5625 inch x 34.125 inch scroll cut dimension.

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173 Id.

Exclusion requested by: Nippon Steel Corp.[174]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Single Reduced Electrolytically Chromium- or Tin-Coated Steel (X-075.1)

Product Description: Gauges: 0.0045 inch nominal, 0.0050 inch nominal, 0.0061 inch nominal (55 pound base box weight), regardless of width, temper, finish, coating or other properties.

Exclusion requested by: Mitsui and Co.[175]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Single Reduced Electrolytic Tinplate (X-075.2 & X-124.1)

Product Description: ASTM A624, ET 35, Type D, T-2, melted coating (bright). (1) 95 pounds/base box (nominal) thickness: 0.0105" +/- 0.005" x 36.375" x C; (2) 90 pounds/base box (nominal) thickness: 0.0099" +/- 0.005" x 36.375 x C.

Exclusion requested by: Mitsui and Co.[176] and Rasselstein.

Response: Domestic Producers object to the exclusion of this product. Weirton can produce this product.

Single Reduced Electrolytic Tinplate (X-075 & X-124.1)

Product Description: ASTM A624, ET 10/25, Type D, T-2, melted coating (bright). (1) 95 pounds/base box (nominal) thickness: 0.0105" +/- 0.005" x 36.375" x C; (2) 90 pounds/base box (nominal) thickness: 0.0099" +/- 0.005" x 36.375 x C.

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174 Id.

175 Exclusion request from Kirkland & Ellis on behalf of the Mitsui & Co. (U.S.A.), Inc. (November 13, 2001) (Public Document).

176 Id.

Exclusion requested by: Mitsui and Co.[177] and Rasselstein.
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Response: **Domestic Producers object to the exclusion of this product. Weirton can produce this product.**

Electrolytically Tin Coated Steel (X-075.8)

Product Description: Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents in the lighter side (detailed below), with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.7 mg/square foot of chromium applied as a cathodic dichromate treatment, with coil form having restricted oil film weight of 0.3-0.4 grams/base box of type DOS-A oil, coil inside diameter ranging from 15.5 to 17 inches, coil outside diameter of a maximum 64 inches, with a maximum coil weight of 25,000 pounds, and with temper/coating/dimension combinations of: (1) CAT 4 temper, 1.00/0.050 pound/base box coating, 70 pound/base box (0.0077 inch) thickness, and 33.1875 inch ordered width; (2) CAT 5 temper, 1.00/0.50 pound/base box coating, 75 pound/base box (0.0082 inch) thickness and 34.9375 inch or 34.1873 inch ordered width; (3) CAT 5 temper, 1.00/0.50 pound/base box coating, 107 pound/base box (0.0118 inch) thickness, and 30.5625 inch or 35.5625 inch ordered width; (4) CADR 8 temper, 1.00/0.50 pound/base box coating, 85 pound/base box (0.0093 inch) thickness, and 35.5625 inch ordered width; (5) CADR 8 temper, 1.00/0.25 pound/base box coating, 60 pound/base box (0.0066 inch) thickness, and 35.9375 ordered width; (6) CADR 8 temper, 1.00/0.25 pound/base box coating, 70 pound/base box (0.0077 inch) thickness, and 32.9375 inch, 33.125 inch, or 35.1875 inch ordered width.

Exclusion requested by: Mitsui and Co.[178]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Electrolytically Tin Coated Steel (X-075.9)

Product Description: Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents on the lighter side (detailed below), with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.5 mg/square foot of chromium applied as a cathodic dichromate treatment, with ultra flat scroll cut sheet form, with CAT 5 temper with 1.00/0.10 pound/base box coating, with a lithograph logo printed in a uniform pattern on the 0.10 pound coating side with a clear protective coat, with both sides

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177 Id.

178 Id.

waxed to a level of 15-20 mg/216 sq. in., with ordered dimension combinations of (1) 75 pound/base box (0.082 inch) thickness and 34.9375 inch x 31.748 inch scroll cut dimensions; or (2) 75 pound/base box (0.0082) inch thickness and 34.1875 x 29.076 inch scroll cut dimensions; or (3) 107 pound/base box (0.0118 inch) thickness and 30.5625 inch x 34.125 inch scroll cut dimension.

Exclusion requested by: Mitsui and Co.[179]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Light Gauge Double Reduced and Single Reduced Electrolytic Tin Plate or Black Plate in 55 Pound Base Box and Below (X-083.C1 & X-124.2)

Product Description: Made to ASTM A623 type MR specifications. These are extremely thin tin products manufactured through reduction on a temper mill following cold-rolling and are primarily used in the production of three-piece can bodies or DRD cans. This product is double-reduced electrolytically coated steel with tin and/or chronium with a thickness of 55 lbs or less per base box.

Exclusion requested by: Usinor, Arbed, and Aceralia[180] and Rasselstein.

Response: Domestic Producers object to the exclusion of this product. Weirton currently produces double-reduced with a thickness of 50 lbs. and more per base box, and therefore only agrees to exclude products with a thickness of 49 lbs per base box and less.

Electrolytic Tin Plate or Black Plate in Widths Larger Than 38.0 Inches (X-083.C2)

Product Description: All tin mill products with widths equal to or greater than 38 inches.

Exclusion requested by: Usinor, Arbed, and Aceralia[181]

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179 Id.

180 Exclusion request from Shearman & Sterling on behalf of Usinor et al. (November 13, 2001) (Public Version).

181 Id.

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product at widths greater than or equal to 40 inches.**

Tinplate DWI for Two Piece Cans (X-083.C3 and X-128.1)

Product Description: Single reduced tinplate in widths ranging from 750 mm to 1,230 mm and the following thicknesses:

- 0.251 mm (90 pound base box)
- 0.260 mm
- 0.267 mm (95 pound base box)
- 0.275 mm (97 pound base box)
- 0.279 mm (100 pound base box)

These products possess type MR or higher chemical compositions and are continuously annealed with yield strengths between 295 mpa and 380 mpa and a tensile strength between 370 mpa and 455 mpa. These products have a minimum elongation of 20 percent and R-bar form 1.0 mini and Delta-R+/-0.30 with a shot blast finish roughness between 0.80 and 1.20 micrometers.

Exclusion requested by: Usinor, Arbed, and Aceralia[182] and Can Alliance for Ball.

Response: **Domestic Producers object to the exclusion of this product. Weirton currently produces these D&I products.**

Tin Mill Products for Easy-Open Ends and Drawn, Redrawn Two-Piece Can Bodies (X-083.C4 and X-128.2)

Product Description: These products consist of steel coated with tin and/or chromium with a thickness below 0.50 mm, yield strengths between 420 mpa and 750 map, and minimum elongation between 4 and 22 percent.

Exclusion requested by: Usinor, Arbed, and Aceralia[183] and Can Alliance for Crown.

Response: **Domestic Producers object to the exclusion of this product. Weirton has qualification trial produced for Easy-Open and is currently producing Drawn, Redrawn for many applications.**

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182 Id.

183 Id.

Organic Coated Tinmill Products (X-083.C5)

Product Description: Electrolytic coated steel with tin and/or chromium with a thickness below 0.50 mm and coated with organic coating.

Exclusion requested by: Usinor, Arbed, and Aceralia[184]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Electrolytic and Lacquered Strips for Tabstock (X-083.C6 & X-128.3)

Product Description: Tinplate and chromium plated coil with a thickness below 0.5 mm and a maximum width of 120 mm laquered or varnished. There is no specific chemical requirements other than those specified in ASTM A623 Type MR. This product is used for the production of easy-open can ends.

Exclusion requested by: Usinor, Arbed, and Aceralia[185] and Can Alliance for Crown.

Response: Domestic Producers object to the exclusion of this product. Weirton currently produces tab stock and can produce to specified tempers.

Diffusion Annealed Tin-Nickel Plated Carbon Steel Sheet for Battery Cell Containers (X-109.1)

Product Description: Diffusion annealed Tin (Sn) plated nickel (Ni) plated carbon steel strip with a cold rolled or tin mill black plate base metal conforming to the chemical requirements based on AISI 1006. Both sides of the cold rolled strip shall initially be electrolytically plated with natural nickel. The material is then annealed to create a diffusion of the Nickel and Iron substrate. Then an additional layer of natural Tin is electrolytically plated on the top side of the nickel plated steel strip and then annealed to create a diffusion of the Nickel and Tin alloys. The tin-nickel, nickel plated material must be sufficiently ductile and adherent to the substrate to permit forming without cracking, flaking, peeling, or any other evidence of separation.

Coating thickness:
Top side: Nickel (Ni) - Tin (Sn) layer together $\geq$ 1.0 micron meters;
Tin (Sn) layer alone $\geq$ 0.05 micron meters
Bottom side: Nickel (Ni) layer $\geq$ 1.0 micron meters

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184 Id.

185 Id.

Exclusion requested by: Mitsubishi International Steel, Inc.[186]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Nickel Plated Diffusion Annealed Tin-Nickel Plated Carbon Steel Sheet for Battery Cell Containers (X-109.2)

Product Description: Natural nickel (Ni) is electrolytically plated to the top side of the diffusion annealed Tin-Nickel plated carbon steel strip with a cold rolled or tin mill black plate base metal conforming to the chemical requirements based on AISI 1006. Both sides of the cold rolled strip shall initially be electrolytically plated with natural Nickel (Ni). Then only the top side of the nickel plated strip is electrolytically plated with Tin (Sn) and then annealed to create a diffusion between the Nickel and Tin layers in which a Ni-Sn alloy is created. Then an additional layer of natural Nickel is electrolytically plated on the top side of the strip of the Nickel-Tin alloy. The nickel-tin-nickel alloy material must be sufficiently ductile and adherent to the substrate to permit forming without cracking, flaking, peeling, or any other evidence of separation.

Coating thickness:
Top side: Nickel-Tin-Nickel combination layer ≥ 1.0 micron meters;
Tin layer only ≥ 0.05 micron meters
Bottom side: Nickel (Ni) layer ≥ 1.0 micron meters

Exclusion requested by: Mitsubishi International Steel, Inc.[187]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Nickel-Graphite Plated Diffusion Annealed Tin-Nickel Plated Carbon Steel Sheet for Battery Cell Containers (X-109.3)

Product Description: A natural composition mixture of Nickel (Ni) and Graphite (G) is electrolytically plated to the top side of the diffusion annealed Tin-Nickel plated carbon steel strip with a cold rolled or tin mill black plate base metal conforming to chemical requirements based on AISI 1006. Both sides of the cold rolled strip shall initially be electrolytically plated with natural Nickel (Ni). Then only the top side of the nickel plated strip is electrolytically plated with Tin (Sn) and then annealed to create a diffusion between the

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186 Exclusion request from Mitsubishi Int'l Steel Inc. (November 13, 2001) (Public Document).

187 Id.

Nickel and Tin layers in which a Ni-Sn alloy is created. Then an additional layer of mixture of natural Nickel and graphite is electrolytically plated on the top side of the strip of the Nickel-Tin alloy.

Coating thickness:
Top side: Nickel-Graphite, Tin-Nickel layer ≥ 1.0 micron meters;
Tin layer only ≥ 0.05 micron meters
Nickel-Graphite Layer only > 0.2 micron meters
Bottom side: Nickel (Ni) layer ≥ 1.0 micron meters

Exclusion requested by: Mitsubishi International Steel, Inc.[188]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Nickel-Graphite Plated Diffusion Annealed Nickel Plated Carbon Steel Sheet for Battery Cell Containers (X-109.4)

Product Description: A natural composition mixture of Nickel (Ni) and Graphite (G) is electrolytically plated to the top side of the diffusion annealed nickel plated carbon steel strip with a cold rolled or tin mill black plate base metal conforming to chemical requirements based on AISI 1006. Both sides of the cold rolled strip shall initially be electrolytically plated with natural Nickel (Ni). The material is then annealed create a diffusion between the Nickel and the Iron substrate. Then an additional layer of natural Nickel-graphite is electrolytically plated on the top side of the strip of the nickel plated steel strip. The nickel-graphite, nickel plated material must be sufficiently ductile and adherent to the substrate to permit forming without cracking, flaking, peeling, or any other evidence of separation.

Coating thickness:
Top side: Nickel-Graphite, Tin-Nickel layer ≥ 1.0 micron meters;
Nickel-Graphite layer ≥ 0.5 micron meters
Bottom side: Nickel (Ni) layer ≥ 1.0 micron meters

Exclusion requested by: Mitsubishi International Steel, Inc.[189]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Diffusion Annealed Nickel-Graphite Plated Carbon Steel Sheet for Battery Cell Containers (X-109.5)

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188 Id.

189 Id.

Product Description: Diffusion annealed Nickel Graphite plated steel strip with a cold rolled or tin mill black plate base metal conforming to the chemical requirements based on AISI 1006. The bottom side of the cold rolled strip shall be electrolytically plated with natural nickel. The top side of the strip is then plated with a Nickel-Graphite composition. The strip is then annealed to create a diffusion of the Nickel-Graphite and the Iron substrate on the bottom side. The Nickel-Graphite and Nickel plated material must be sufficiently ductile and adherent to the substrate to permit forming without cracking, flaking, peeling, or any other evidence of separation.

Coating thickness:
Top side: Nickel-Graphite layer ≥ 1.0 micron meters;
Bottom side: Nickel (Ni) layer ≥ 1.0 micron meters

Exclusion requested by: Mitsubishi International Steel, Inc.[190]

Response: Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.

Nickel (Ni)-Phosphorous(P) Plated Diffusion Annealed Nickel Plated Carbon Steel Sheet for Battery Cell Containers (X-109.6)

Product Description: A natural composition mixture of Nickel (Ni) and Phosphorus (P) is electrolytically plated to the top side of the diffusion annealed nickel plated steel strip with a cold rolled or tin mill black plate base metal conforming to the chemical requirements based on AISI 1006. Both sides of the cold rolled strip shall initially be electrolytically plated with natural nickel. The material is then annealed to create a diffusion of the Nickel and Iron substrate. Then another layer of the natural Nickel-phosphorous is electrolytically plated on the top side of the nickel plated steel strip. The nickel-phosphorous, nickel plated material must be sufficiently ductile and adherent to the substrate to permit forming without cracking, flaking, peeling, or any other evidence of separation.

Coating thickness:
Top side: Nickel-phosphorous, nickel layer ≥ 1.0 micron meters;
Nickel-phosphorous layer ≥ 0.1 micron meters
Bottom side: Nickel (Ni) layer ≥ 1.0 micron meters.

Exclusion requested by: Mitsubishi International Steel, Inc.[191]

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190 Id.

191 Id.

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Tin Free Steel for Inner Magnetic Steel (42RSN) (X-111)

Product Description: Steel coated with a metallic chromium layer between 100-200 mg/m^2 and has a chromium oxide layer between 5-30 mg/m^2. It has a chemical composition of 0.05% maximum carbon, 0.03% maximum silicon, 0.60% maximum manganese, 0.02% maximum phosphorus, and 0.02% maximum sulfur. 42RSN has a magnetic flux density ("Br") of 10 kg minimum and a coercive force ("Hc") of 3.8 Oe maximum.

Exclusion requested by: Japanese Respondents[192]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Mounting Cap Material (X-124.1)

Product Description: The product is known as single reduced electrolytically tin-coated steel, plain or lacquered, in gauges from 90-95 pound box weight, with properties of T-2 temper and a special forming steel grade in widths below 10 inches regardless of finish, coating or other properties for end use mounting caps. The applicable HTS categories are 7212.10.0000 and 7212.40.1000. Due to drawing requirements mounting caps material must be of extremely high cleanliness, and is accordingly produced on lines using nonmetallic inclusion detectors (IDD-devices).

Exclusion requested by: Rasselstein Hoesch GmbH[193]

Response: **Domestic Producers object to the exclusion of this product. Weirton can produce this product.**

Thin Gauges Below 56 Pound Base Box Weight (X-124.2)

Product Description: The product is known as double reduced electrolytically chromium- or tin-coated steel in gauges equal to or below 56 base box weight, regardless of temper, finish, coating or other

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192 Exclusion request from Wilkie Farr & Gallagher on behalf of various Japanese respondents (November 13, 2001) (Public Document).

193 Exclusion request from deKieffer & Horgan on behalf of Rasselstein Hoesch GmbH (November 13, 2001) (Public Document).

properties. The HTS categories are 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.70.6090, 7212.10.0000, and 7212.50.0000. This steel must be specially selected and produced on lines utilizing non-metallic inclusion detectors (IDD-devices). There are elevated requirement on shape (specific flatness) and uniformity of mechanical properties to insure the product can be processed on high-speed lines.

Exclusion requested by: Rasselstein Hoesch GmbH[194]

Response: Domestic Producers object to the exclusion of this product. Weirton currently produces double-reduced at 50 lbs and more and therefore agrees to exclude only products with base box weight less than or equal to 49 lbs.

Twist-Off Material (X-124.3)

Product Description: The product is double-reduced electrolytically chromium- or tin-coated steel, micro alloyed, ultra low carbon, vacuum degassed, regardless of temper, finish coating or other properties. This material is for a twist-off end use with limited earing (special minimum earing) below 1 mm (0.0394 inches). The HTS categories are 7210.11.0000, 7210.12.0000, and 7210.50.0000.

Exclusion requested by: Rasselstein Hoesch GmbH[195]

Response: Domestic Producers object to the exclusion of this product. Weirton currently produces this cap stock for many customers.

Wide-Width Material, >38 Inches (X-124.4)

Product Description: This product in known as single and double reduced electrolytically chromium- or tin-coated steel in width equal to or over 38 inches, regardless of temper, finish coating or other properties. The HTS categories are 7210.11.0000, 7210.12.0000, 7210.50.0000 and 7210.70.6090. This product must be produced on lines with non-metallic inclusion detectors (IDD-devices) because it is designed for D+1- or deep drawing process (DRD).

Exclusion requested by: Rasselstein Hoesch GmbH[196]

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194 Id.

195 Id.

196 Id.

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product in widths greater than or equal 40 inches.**

Wide-Width Material, >38 Inches (X-124.4)

Product Description: This product in known as single and double reduced electrolytically chromium- or tin-coated steel in width equal to or over 38 inches, regardless of temper, finish coating or other properties. The HTS categories are 7210.11.0000, 7210.12.0000, 7210.50.0000 and 7210.70.6090. This product must be produced on lines with non-metallic inclusion detectors (IDD-devices) because it is designed for D+1- or deep drawing process (DRD).

Exclusion requested by: Rasselstein Hoesch GmbH[197]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product in widths greater than or equal 40 inches.**

Ultra Wide Tin Free Steel (X-171)

Product Description: 1) Tin free steel in gauges 75 lb. to 112 lb. per base box, single reduced, continuously annealed, in widths equal or exceeding 42 inches; and 2) Electro-tinplated flat-rolled carbon or alloy steel, in gauges 80 lb. to 110 lb per base box, single-reduced, continuously annealed, in widths equal to or exceeding 45 inches.

Exclusion requested by: Silgan Containers.[198]

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

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197 Id.

198 Exclusion request from Willkie Farr & Gallagher on behalf of Silgan Containers (November 12, 2001) (Public Document).